

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

CAROLE GIBBS and ARTHUR COLBY,  
individually and on behalf of all others  
similarly situated,

*Plaintiffs,*

v.

SOLARCITY CORPORATION, a Delaware  
corporation,

*Defendant.*

Case No. 4:16-cv-11010-TSH

**DECLARATION OF ATTORNEY STEVEN L. WOODROW IN SUPPORT  
OF MOTION FOR AN AWARD OF REASONABLE ATTORNEYS'  
FEES AND FOR REIMBURSEMENT OF EXPENSES**

I, Steven L. Woodrow, on oath declare as follows:

1. I am a partner with the law firm of Woodrow & Peluso, LLC. I am one of the attorneys for the plaintiffs in the case of *Gibbs, et al. v SolarCity Corporation*, Case No. 4:16-cv-11010, pending in the District of Massachusetts. I am over the age of 18 and can competently testify to the matters set forth below. I submit the following declaration in support of the attorneys' fees petition made in the case of *Lucero, et al. v. SolarCity Corporation*, Case No. 3:15-cv-05107, pending the Northern District of California.

***Pre-Suit Investigation and Nature of the Case***

2. Our lawsuit challenges Defendant SolarCity Corporation's ("SolarCity" or "Defendant") alleged violations of the Telephone Consumer Protection Act, 47 U.S.C. § 227, *et seq.* ("TCPA). In short, Plaintiffs Gibbs and Colby allege that SolarCity makes repeated calls to telephone numbers listed on the federal Do Not Call Registry as well as to people who specifically inform SolarCity that they are not interested in SolarCity's solar panels or in receiving Solar City's calls.

3. In early-May 2016, my Partner Patrick Peluso and I became aware of a potential case against SolarCity—a large solar energy system manufacturer and installer—for what appeared to potentially be systemic violations of the TCPA as it related to Gibbs (a Massachusetts resident) as well as to Colby (a Connecticut resident).

4. An attorney that our firm has worked with in the past on TCPA matters, Stefan Coleman, first brought the potential case to our attention.

5. Following initial discussions, we worked with attorney Coleman to identify and clarify the operative facts. In Gibbs' case, a salesman visited her home in approximately 2014 and offered SolarCity's products. Ultimately Gibbs informed the salesman that she wasn't interested. Despite expressing no interest—and despite having her number on the National Do Not Call Registry since July 2005—Gibbs received telemarketing calls from SolarCity in April 2016.

6. In Colby's case, in approximately late 2015, he visited SolarCity's website and requested a quote for solar panels. A site visit to Plaintiff Colby's house ensued, but SolarCity informed Colby his home was not positioned well for solar installation and that he wouldn't be able to buy SolarCity's products. Colby understood this to be the end of the potential transaction. Despite this, Colby received repeated telemarketing calls from SolarCity for a period of at least 6 months despite being on the DNC Registry since October 2008. The calls continued even after Colby repeatedly told SolarCity to stop calling him.

7. Our pre-suit investigation involved working with Mr. Coleman on performing diligent research into SolarCity's business model and its calling practices. This included reviewing complaints from other consumers about calls they had received SolarCity posted in

online complaint forums. It also included general internet research regarding SolarCity and a PACER search of cases against SolarCity.

8. Our pre-suit investigation also involved reviewing closely a previously-filed TCPA action in the Northern District of California, the *Morris* (later *Lucero*) case. We closely analyzed the complaint and other relevant filings in the *Morris* action and concluded that the scenario of Gibbs and Colby was distinguishable. Specifically, the calls in *Morris* were apparently coming from a generator who sold leads to SolarCity and other solar companies whereas Gibbs and Colby were being called directly by SolarCity. Gibbs and Colby had also each requested that SolarCity stop calling them, and therefore also had “stop calling” claims, which appeared to be absent from the pleadings in *Morris*.

9. Satisfied with our pre-suit investigation, my firm thereafter coordinated with local counsel in Massachusetts, Julie Tolek, to file our initial Complaint. Following these discussions, on June 1, 2016, we filed the Gibbs and Colby matter in the United States District Court for the District of Massachusetts (Worcester).

#### **California Plaintiffs’ Motion to Intervene and Transfer**

10. Approximately one week prior to the filing of the *Gibbs* Complaint, the plaintiffs in the California action, Morris, Lucero, and Hall, filed their Second Amended Complaint apparently refining their claims against SolarCity.

11. On July 21, 2016, I learned that plaintiffs’ counsel in the California action had filed a motion to be appointed interim class counsel by the Court.

12. On July 26, 2016, I was contacted by plaintiffs' counsel in the California action, Joshua Arisohn, and met-and-conferred with Mr. Arisohn on July 27, 2016 regarding his anticipated Motion to Intervene and Transfer to be filed in the Massachusetts case.

13. The next day, on July 27, 2016, the California plaintiffs' filed their Motion to Intervene and Transfer.

14. The Motion to Intervene and Transfer argued that intervention should be granted as a matter of right, that permissive intervention was appropriate, and that the entire case should be transferred under the first-to-file rule. The motion also raised claimed that intervention and transfer were necessary to protect the as-yet uncertified class from a supposed "reverse auction."

15. Analyzing and preparing a response to the Motion to intervene necessitated significant legal and factual research on the part of our attorneys so as to address each of the arguments raised. We also met and conferred extensively with SolarCity regarding the arguments, particularly to as to ascertain whether there was actually any risk of a reverse auction (which ultimately, given the total absence of settlement negotiations between SolarCity and any of the plaintiffs at that time, was essentially equal to zero.)

16. Ultimately on August 31, 2016 Gibbs and Colby filed their Opposition to the Motion to Intervene and Transfer. In the opposition brief, Gibbs and Colby argued that Gibbs and Colby argued that the case should not be transferred because the class definitions do not overlap, the interests of justice did not require a transfer, and the claimed concern about a reverse auction was entirely unfounded. Gibbs and Colby also explained that no intervention should be allowed because, to the extent the cases actually overlapped, the California plaintiffs' rights were adequately protected, that the motion to intervene was premature, and that no realistic threat that their interests will somehow be impeded was shown by the California plaintiffs.

### **SolarCity's Motion to Dismiss**

17. On August 12, 2016, SolarCity moved to dismiss the Massachusetts Complaint, relying primarily on the grounds that its calls somehow failed to constitute “concrete harm” sufficient to show injury-in-fact in light of the (as of that time) recent Supreme Court case *Spokeo v. Robins*, 136 S. Ct. 1540 (May 16, 2016). SolarCity also took issue with the sufficiency of Gibbs and Colby's pleadings and attempted to graft a third phone call requirement onto the TCPA's Do Not Call rules.

18. As with the Motion to Intervene and Transfer, SolarCity's Motion to Dismiss necessitated significant research time into the various arguments raised.

19. Gibbs and Colby filed their response to SolarCity's Motion to Dismiss on August 26, 2016. In the response, we argued that TCPA claims for unwanted telephone calls cause concrete injuries sufficient for Article III standing purposes in the wake of *Spokeo*. We also defended against SolarCity's attacks on the sufficiency of the pleadings and pointed out SolarCity's mistaken belief that a third offending call is required under the TCPA's Do Not Call rules (the rules require two offending calls within any twelve-month period).

20. Ultimately, on March 8, 2017, Judge Hillman denied SolarCity's motion to dismiss in its entirety.

### ***A Full-Day Mediation Session is Held With Judge Denlow, Settlement Discussions Continue After the Mediation, and an Agreement is Reached***

21. Shortly following its filing of its Motion to Dismiss, I engaged with preliminary discussions with SolarCity's counsel regarding the potential for a global mediation. Thereafter, at SolarCity's invitation, in November 2016, my firm, counsel for plaintiffs in the California action, and counsel for SolarCity discussed the possibility of a joint mediation. The Parties eventually

agreed to mediate in January 2017 in Chicago with Magistrate Judge Morton Denlow (Ret.) of JAMS.

22. In the midst of preparing for the mediation with Magistrate Judge Denlow, on December 8, 2016, Judge Hillman held a hearing in the Gibbs matter regarding both the California plaintiffs' Motion to Intervene and Transfer as well as on SolarCity's Motion to Dismiss. Patrick Peluso, a partner with my lawfirm, attended the hearing in-person and argued the Motions.

23. Mr. Peluso, who was ultimately victorious on the oral argument, prepared extensively for the oral argument. This included significant research and preparation time, including reviewing and discussing answers to potential arguments.

24. The hearing also required significant travel time—Mr. Peluso traveled from Denver, CO to Worcester, MA.

25. Following oral argument in December 2016, we engaged in a full day, in-person mediation session on January 31, 2017 in Chicago, Illinois with Magistrate Judge Denlow. The negotiations were extensive and substantial information was provided regarding the calls made by SolarCity. Ultimately, the Parties were unable to reach an agreement on a settlement framework or the relief to be made available to the Class, but we believe most attendees agreed that progress had been made.

26. Indeed, the mediation was helpful in that it helped each side gain an understanding of the other side's perspective and views, their respective evaluations of the case, the exposure faced, and the key questions pending in the litigation that potentially needed to be resolved for settlement talks to reconvene.

27. The mediation was also helpful because, in the lead up to the session with Magistrate Judge Denlow, it provided an opportunity for the lawyers representing Gibbs and Colby to self-order and work cooperatively with plaintiffs' counsel in the California action.

28. Indeed, as a result of this cooperation, a joint prosecution agreement was agreed to in December 2016. Furthermore, following the mediation session itself, the California plaintiffs withdrew their motion to intervene and transfer on February 2, 2017.

29. From that point forward, plaintiffs in the Massachusetts and California actions presented a united front in on-going settlement negotiations.

30. Settlement discussions continued throughout the next several weeks.

31. Eventually, the negotiations cumulated in the parties reaching an agreement to settle the case on a class-wide basis in May 2017. Following a Motion to Enforce the Parties' terms sheet, the Preliminary Approval Motion was filed on July 14, 2017.

***My Firm's Lodestar, Experience, and Other Considerations***

32. My firm's diligent work throughout this litigation has resulted in a meaningful lodestar performed on work that benefitted the Settlement Class.

33. Pursuant to our firm's billing protocol, attorneys at our firm enter their billing regularly using our "Freshbooks" system. Time was entered in this case in accordance with our firm's billing protocol and has been reviewed to delete any time misspent, any duplication of effort, and for any other entries for which there was insufficient justification.

34. As of the time of filing, my firm's lodestar is reflected in the following chart:

Attorney Name/Firm	Position	Rate	Hours	Lodestar
Steven Woodrow/ Woodrow & Peluso	Partner	\$440	303.7	\$133,628.00
Patrick Peluso/ Woodrow & Peluso	Partner	\$340	309.8	\$105,332.00

<b>CURRENT LODESTAR</b>			613.5	\$238,960.00
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35. Such time was dedicated to work that advanced the litigation and Settlement. Our firm took this matter on a contingency with no guarantee of payment. Indeed, the law on the TCPA is not entirely settled, and even judgments at trial are reversed on appeal. During the pendency of these matters new laws and decisions bearing on "pick offs", Article III standing, and the definition of autodialer were being issued with regularity. We also spent substantial time on the case and were necessarily precluded from working on other potential class actions (in addition to doing more work for the firm's paying clients).

36. As shown in the attached Firm Resume, our firm, Woodrow & Peluso, LLC, routinely litigates nationwide class actions under the Telephone Consumer Protection Act. Litigating such cases requires both knowledge of the substantive law—the TCPA—as well as of class action practice and procedure. We brought that skill to bear in this case, which included preparing all pleadings and filings, as well as achieving the instant Settlement. Our lawyers have significant experience litigating such cases and do so with an eye for proceeding in a way so as to maximize efficiency and minimize waste. Indeed, as we take the cases on a contingent basis, we have no incentive to perform work that is anything other than productive and efficient.

37. The instant Settlement represents a positive result for the Class.

38. Additionally, my firm's rates are consistent with the market for reasonably comparable practitioners. Our rates are the rates we charge to paying clients for whom we do hourly work, and they are lower than the rates that Courts approved for me when I was a partner at my prior firm.<sup>1</sup>

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<sup>1</sup> See e.g. *Wigod v. Wells Fargo Bank, N.A.*, Case No: 1:10-cv-2348 (N.D. Ill. 2014) (*Wigod* Dkt. 278)) (approving hourly rate of \$570 for my work in 2014); see also *Schulken v. Washington Mutual Bank*, No. 09-CV-02708-LHK (N.D. Cal.) (*Schulken* Dkt. 223) (Judge Koh approving



39. As such, my firm expended a total of 613.5 hours for a lodestar of \$238,960.

**My Firm's Expenses**

40. As shown in the attached Expenses Report, my firm expended a total of \$1,740.65 prosecuting the case. This included service of process fees, pro hac vice fees, and travel expenses. These expenses are reasonable and have been reviewed to ensure that any non-compensable charges have been removed. These expenses are in addition to our co-Counsel's expenses.

41. In my opinion, the Settlement represents a strong result for the Settlement Class. Further affiant sayeth not.

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I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed in Denver, Colorado, on November 7, 2017.

/s/ Steven L Woodrow  
Steven L. Woodrow

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my former hourly rate of \$500 in 2012). I reduced my rates when starting my own law firm to reflect the realities that larger firms command higher rates in the market.

# EXHIBIT A

### **WOODROW & PELUSO, LLC FIRM RESUME**

WOODROW & PELUSO, LLC (“Woodrow & Peluso” or the “firm”) is a plaintiff’s class action and commercial litigation firm based in Denver, Colorado. The firm files cases across the Country.

Our attorneys have over a decade of experience successfully representing consumers and small businesses in matters nationwide. From litigation under the Telephone Consumer Protection Act, 47 U.S.C. § 227 *et seq.*, to cases enforcing the rights of job applicants and employees under the Fair Credit Reporting Act, 15 U.S.C. § 1681 *et seq.*, to appeals of first impression, our lawyers have litigated and favorably resolved numerous legal disputes to the satisfaction of our clients. At Woodrow & Peluso, LLC, we take special pride in the quality of our work product and strive tirelessly to achieve the best results for every client. Descriptions of our three primary practice areas—(1) Consumer Class Actions, (2) Commercial Litigation, and (3) Appeals—and key personnel follow.

### **OUR PRACTICE AREAS**

#### **1. CONSUMER CLASS ACTIONS**

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The majority of the firm’s caseload focuses on consumer class actions. These cases include class actions alleging violations of statutes, such as the Fair Credit Reporting Act, the Telephone Consumer Protection Act, and the Truth-in-Lending Act, as well as class actions challenging systematic breaches of contract and advancing other common law theories.

#### **TCPA Class Actions**

Woodrow & Peluso attorneys have successfully litigated and settled numerous class actions challenging violations of the Telephone Consumer Protection Act. To date we have filed, prosecuted, and resolved using various settlement models TCPA cases against major corporations and entities including Rita's Italian Ice, Global Marketing Research Services, LKQ Corporation, J.B. Hunt, Altisource, Acurian, Price Self Storage, Local Lighthouse, Geekatoo, and the University of South Carolina, among others. Our firm’s attorneys have substantial experience prosecuting such claims, including class actions challenging the unlawful transmission of text messages, the sending of unlawful facsimiles, the placement of “robocalls” featuring a pre-recorded voice to residential landline phones, and the use of automatic telephone dialing systems, including predictive dialers, to call consumer cell phones.

Notable TCPA cases and settlements include:

- *Wendell H. Stone & Co. v. LKQ Corporation*, 16-cv-07648 (N.D. Ill) (Kennelly, J.) (granting final approval to all-in, non-reversionary, settlement fund of \$3,266,500) (final approval granted May 16, 2017).
- *Martin et al. v. Global Marketing Research Services, Inc.*, 6:14-cv-1290-ORL-31-KRS (M.D. FL) (Woodrow & Peluso appointed co-lead Settlement Class Counsel in settlement creating \$10 million fund for class of 688,500 cellphone users) (final approval

granted November 4, 2016);

- *Mendez v. Price Self Storage Management, Inc.*, 3:15-cv-02077-AJB-JLB (S.D. CA) (Woodrow & Peluso appointed co-lead Settlement Class Counsel in TCPA settlement providing option of \$750 cash or \$1,100 in storage certificates) (final approval granted August 23, 2016);

- *Sherry Brown and Ericka Newby v. Rita's Water Ice Franchise Company, LLC*, 2:15-cv-03509-TJS (E.D. PA) ("all in" non-reversionary \$3,000,000 settlement fund for text messages) (final approval granted March 20, 2017).

Further, while a Partner with his prior law firm, Woodrow & Peluso attorney Steven Woodrow was appointed interim co-lead class counsel in a TCPA class action against Nationstar Mortgage, LLC (*see Jordan et al v. Nationstar Mortgage LLC*, 3:14-cv-00787-WHO) and led TCPA litigation that resolved favorably against Bankrate Inc., and Carfax.com. Mr. Woodrow was also involved in the TCPA settlement reached in *Weinstein v. The Timberland Co. et al.* (N.D. Ill.), a text messaging class action featuring 40,000 unauthorized messages, and was part of the appellate strategy team that secured the landmark decision in *Satterfield v. Simon & Schuster, Inc.*, 569 F.3d 946 (9th Cir. 2009), the first federal appellate decision to affirm that text messages are covered as "calls" under the TCPA.

### **FCRA Class Actions**

The second sub-focus within the firm's class action practice consists of cases under the Fair Credit Reporting Act ("FCRA"), which regulates the procurement and use of consumer reports by employers when they make hiring/firing/pay decisions. To date, the firm has successfully represented clients in putative class actions against Terminix, ServiceMaster, TrueBlue Inc./Labor-Ready Mid-Atlantic, FedEx, Tyler Staffing Services, Inc., Great Lakes Wine & Spirits, Freeman Webb, Inc., and others. This includes *Woodford v. World Emblem* 1:15-cv-02983-ELR, an FCRA settlement providing between \$315 and \$400 to claimants (final approval granted January 23, 2017).

### **Banking and Financial Institutions Class Actions**

Our attorneys have substantial experience representing consumers in class action litigation involving national banking associations and other financial institutions. Meaningful representations include:

- *Schulken v. Washington Mut. Bank*, No. 09-CV-02708-LHK, 2012 WL 28099, at \*15 (N.D. Cal. Jan. 5, 2012). Attorney Steven Woodrow secured prior firm's appointment as Class Counsel from Judge Lucy Koh in class action challenging JPMorgan Chase Bank, N.A.'s suspension of former WaMu home equity line of credit accounts. Case settled with Mr. Woodrow's appointment as co-lead settlement class counsel.
- *In re JPMorgan Chase Bank, N.A. Home Equity Line of Credit Litigation*, MDL No. 2167. Attorney Steven Woodrow helped secure transfer by the

Judicial Panel on Multidistrict Litigation to the Northern District of Illinois and appointment of prior firm as interim class counsel. Attorney Woodrow also negotiated and was also appointed co-lead settlement class counsel in settlement projected to restore between \$3 billion - \$5 billion in credit to affected borrowers in addition to cash payments.

- *Hamilton v. Wells Fargo Bank, N.A.*, 4:09-cv-04152-CW (N.D. Cal.). Attorney Steven Woodrow served as co-lead settlement counsel in class action challenging Wells Fargo's suspensions of home equity lines of credit. Nationwide settlement restored access to over \$1 billion in credit and provided industry leading service enhancements and injunctive relief.
- *In re Citibank HELOC Reduction Litigation*, 09-CV-0350-MMC (N.D. Cal.). Attorney Steven Woodrow was appointed interim co-lead counsel and settlement class counsel in class actions challenging Citibank's suspensions of home equity lines of credit. The settlement was estimated to have restored over \$650,000,000 worth of credit to affected borrowers.
- *Vess v. Bank of America, N.A.* 10cv920–AJB(WVG) (S.D. Cal.). Attorney Steven Woodrow negotiated class action settlement with Bank of America challenging suspension and reduction of home equity lines of credit.
- *Wigod v. Wells Fargo*, No. 10-cv-2348 (N.D. Ill.). Steven Woodrow secured the first appellate decision in the country recognizing the right of homeowners to sue under state law to enforce HAMP trial plan agreements. Attorney Steven Woodrow was appointed co-lead settlement counsel providing loan modifications and cash payments to affected borrowers.

### **General Consumer Protection Class Actions**

Woodrow & Peluso attorneys have additionally successfully prosecuted and resolved countless class action suits against other companies for a range of consumer protection issues. For example, Woodrow & Peluso filed the first class action in the Country to challenge the marijuana industry's use of certain allegedly dangerous fungicides and pesticides and were the first lawyers to bring class actions (against the Colorado Rockies Baseball Club and Kroenke Sports & Entertainment, LLC) seeking to enforce the Colorado Consumer Protection Act, § 6-1- 718 *et seq.*, which prohibits owners of entertainment venues from imposing restrictions on the resale of tickets. The firm has also brought and litigated class actions against hospitals for their use of "chargemaster" billing rates and are presently engaged in litigation against Southwest Airlines related to its "Companion Pass" program.

Woodrow & Peluso LLC has also brought claims against major food manufacturers and distributors for falsely advertising certain products as "All Natural" and "Made in U.S.A." Our attorneys also have experience litigating class claims regarding missing or misappropriated "bitcoins." Woodrow & Peluso also brought the first class action in Colorado against cannabis growers for their use of unapproved and harmful pesticides.

## 2. COMMERCIAL LITIGATION

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As small business owners, we understand and appreciate the challenges that new companies face as they strive to make headway in the market. Our attorneys regularly counsel small to medium-sized businesses and have represented such companies in a wide range of general commercial litigation matters including partnership and business disputes, breaches of contracts and term sheets, and claims charging company managers and members of breach of fiduciary duty, breach of contract, fraud, and fraudulent/preferential transfers. We regularly advise clients on matters and contracts involving millions of dollars, and our attorneys have successfully represented businesses and other entities in mediations, arbitrations, and trial.

## 3. APPEALS

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Our attorneys have substantial experience handling appeals at both the state and federal level. Representative appeals worked on predominately by our attorneys include:

- *Wigod v. Wells Fargo Bank, N.A.*, 673 F.3d 547 (7th Cir. 2012). Attorney Steven Woodrow briefed and argued this appeal resulting in the first federal appellate decision holding that banks may be sued under state law for violations of the federal government's Home Affordable Modification Program. The opinion has been cited over 1,300 times by courts, litigants, and commentators throughout the Country and is widely regarded as the leading authority on the rights and obligations of HAMP servicers and borrowers.
- *Robins v. Spokeo*, 742 F.3d 409 (9th Cir. 2014). Attorney Steven Woodrow argued a federal appeal reversing dismissal and upholding consumer rights under the Fair Credit Reporting Act against one of the nation's largest online data aggregators regarding whether a plaintiff who does not suffer tangible pecuniary loss may still show legal harm to satisfy Article III standing. The case was reversed on writ of certiorari to the United States Supreme Court (argued by different attorneys).
- *Equity Residential Properties Mgmt. Corp. v. Nasolo*, 364 Ill. App. 3d 26, 28, 847 N.E.2d 126, 128 (2006). Attorney Steven Woodrow helped author the winning brief in this landmark landlord/tenant appeal defining the requirements for constructive service and due process for Illinois evictions under the Illinois Forcible Entry and Detainer Act. 735 ILCS 5/9–107 *et seq.*
- *Fuentes v. Kroenke Sports & Entertainment, LLC*, Case No. 2014CV32619. Woodrow & Peluso appealed grant of summary judgment in favor of defendant finding that the Colorado Consumer Protection Act, 6-1-701 *et seq.* does not allow for class actions. Case settled prior to the resolution of the appeal.

## OUR ATTORNEYS

At present, our firm consists of 2 attorneys whose relevant experience is set forth below.

**STEVEN LEZELL WOODROW** has over a decade of experience advising consumers and small businesses in high stakes litigation.

Steven briefed and delivered the winning argument in the landmark federal appellate court decision *Wigod v. Wells Fargo Bank, N.A.*, 673 F.3d 547 (7th Cir. 2012) holding banks accountable for violations of the federal Home Affordable Modification Program. The opinion is widely regarded as the leading authority on the rights and obligations of HAMP servicers and borrowers. Steven also delivered the winning oral argument in *Robins v. Spokeo*, 742 F.3d 409 (9th Cir. 2014), a federal appeal upholding consumer rights under the Fair Credit Reporting Act against one of the nation's largest online data aggregators. The case and the Supreme Court decision that ultimately reversed it (and now the Ninth Circuit's decision to re-affirm its prior finding of Article III standing) present some of the most widely-litigated issues in class action practice today.

Mr. Woodrow was appointed lead class counsel in litigation against JPMorgan Chase Bank, N.A. challenging the bank's 4506-T HELOC suspension program and was appointed lead settlement class counsel in other HELOC suspension litigation against Wells Fargo Bank, N.A., Citibank, N.A., Chase, Bank of America, N.A. and PNC Bank.

Mr. Woodrow also led the legal team that secured a preliminary injunction freezing the U.S. assets of Mark Karpeles, the former head of the failed Bitcoin exchange known as Mt. Gox, as well as an order compelling Mr. Karpeles to personally appear in the United States for a deposition in connection with Mt. Gox's Chapter 15 bankruptcy case in Dallas Texas.

Steven has also litigated putative class actions under the Telephone Consumer Protection Act, and courts have appointed him to serve as class counsel in nationwide settlements against cellphone companies, aggregators, and mobile content providers related to unfair billing practices, including *Paluzzi v. Cellco Partnership*, *Williams v. Motricity, Inc.*, and *Walker v. OpenMarket Inc.*

Steven has also served as an Adjunct Professor of Law at the Illinois Institute of Technology Chicago-Kent College of Law, where he co-taught a seminar on class actions. Prior to founding Woodrow & Peluso, Steven was a partner at prominent class action technology firm in Chicago.

Before that, he worked as a litigator at a Chicago boutique where he tried and arbitrated a range of consumer protection, landlord tenant, and real estate matters.

## EDUCATION

Chicago-Kent College of Law, J.D., High Honors, 2005

The University of Michigan-Ann Arbor, B.A, Political Science, with Distinction, 2002

## ADMISSIONS

State of Illinois (2005)

State of Colorado (2011)  
United States Court of Appeals for the Seventh Circuit  
United States Court of Appeals for the Ninth Circuit  
United States District Court, Northern District of Illinois  
United States District Court, District of Colorado  
United States District Court, Eastern District of Michigan  
United States District Court, Western District of Michigan  
United States District Court, District of New Mexico

**PATRICK H. PELUSO** specializes in plaintiff-side consumer class actions.

With a true passion for protecting consumers and their rights, Patrick aggressively pursues class action lawsuits against companies who violate those rights.

Through these lawsuits, he is able to force law-breaking companies to compensate the people they have harmed and correct their future practices. Patrick possesses the skills, strategic vision, and moxie to achieve excellent results for the people he represents. He has experience working with a broad range of consumer protection laws including the Fair Credit Reporting Act, the Telephone Consumer Protection Act, and various state consumer protection and consumer fraud statutes.

Patrick received his law degree from the University of Denver, Sturm College of Law where he was Editor-in-Chief of an academic journal. During law school, Patrick worked with a leading consumer class action law firm and held legal internships with a federal administrative judge and the legal department of a publicly traded corporation. Before law school, Patrick attended New York University, where he graduated with a B.S. and played on the school's club baseball team.

Patrick grew up in Baltimore, Maryland and now resides in Denver, Colorado.

## **EDUCATION**

University of Denver, J.D. 2014  
New York University, B.S.

## **ADMISSIONS**

State of Colorado (2014)  
United States District Court, District of Colorado  
United States District Court, District of New Mexico



# EXHIBIT B

Woodrow & Peluso, LLC  
 3900 E Mexico Ave  
 Suite 300  
 Denver CO  
 United States



ppeluso@woodrowpeluso.com

Invoice # 0000100

Invoice Date October 31, 2017

**Balance Due (USD) \$238,960.00**

Task	Time Entry Notes	Rate	Hours	Line Total
Communication	[Gibbs v. SolarCity 05/15/16] Steven Woodrow: Review and analyze email from S.Coleman re: potential case vs. SolarCity: review and analyze case info (1.1); review sample pleading (.8); review Complaint and dkt in Morris case pending in ND CA and examine differences (.9)	440.00	2.8	1,232.00
Communication	[Gibbs v. SolarCity 05/16/16] Patrick Peluso: Review Stefan Coleman email re potential case against SolarCity	340.00	0.4	136.00
Communication	[Gibbs v. SolarCity 05/16/16] Patrick Peluso: Review and analyze case notes sent by Stefan Coleman re potential case against SolarCity	340.00	1.4	476.00
Pleadings, Motions, or other Writing	[Gibbs v. SolarCity 05/16/16] Patrick Peluso: Review, analyze, and initial edit of 1st draft of the pleadings	340.00	3.3	1,122.00
Communication	[Gibbs v. SolarCity 05/16/16] Patrick Peluso: Conference with S Woodrow regarding potential SolarCity case	340.00	0.3	102.00
Pleadings, Motions, or other Writing	[Gibbs v. SolarCity 05/16/16] Patrick Peluso: Review and analyze Morris v SolarCity (case filed in ND Cal) complaint and docket	340.00	2.8	952.00
Communication	[Gibbs v. SolarCity 05/16/16] Patrick Peluso: Conference with S Woodrow and S Coleman regarding SolarCity case	340.00	0.6	204.00
Communication	[Gibbs v. SolarCity 05/16/16] Steven Woodrow: Conf w/ S.Coleman re: potential litigation vs. SolarCity re: TCPA	440.00	0.6	264.00
Research	[Gibbs v. SolarCity 05/17/16] Patrick Peluso: Research into lawyers on both sides of ND Cal case and their TCPA experience	340.00	1.3	442.00
Research	[Gibbs v. SolarCity 05/17/16] Patrick Peluso: Review and analyze 26f report filed in Morris and the case schedule issued	340.00	1.2	408.00
Research	[Gibbs v. SolarCity 05/17/16] Steven Woodrow: Analyze impact of Spokeo v. Robins decision on telemarketing calls under the TCPA	440.00	1.8	792.00
Research	[Gibbs v. SolarCity 05/18/16] Patrick Peluso: Review, edit, and further review S Woodrow's edits to draft complaint	340.00	3.4	1,156.00

Task	Time Entry Notes	Rate	Hours	Line Total
Communication	[Gibbs v. SolarCity 05/18/16] Patrick Peluso: Conference with S Woodrow re his research into 47 CFR 64.1200	340.00	0.3	102.00
Pleadings, Motions, or other Writing	[Gibbs v. SolarCity 05/18/16] Steven Woodrow: Revise and edit draft complaint: research re: 47 CFR 64.1200 and review and editing of DNC allegations (1.8); edit prayer for relief (.3); revise allegations re: telemarketing revocation class def. and claims (.8)	440.00	2.9	1,276.00
Pleadings, Motions, or other Writing	[Gibbs v. SolarCity 05/19/16] Patrick Peluso: Online research into SolarCity's business model and its marketing efforts	340.00	2.7	918.00
Pleadings, Motions, or other Writing	[Gibbs v. SolarCity 05/19/16] Patrick Peluso: Review S Woodrow's edits to SolarCity complaint (.3) and make additional revisions (.8)	340.00	1.1	374.00
Pleadings, Motions, or other Writing	[Gibbs v. SolarCity 05/19/16] Steven Woodrow: Further revise and edit draft Complaint for typos, grammar, and allegations and email to S.Coleman	440.00	0.3	132.00
Research	[Gibbs v. SolarCity 05/19/16] Steven Woodrow: Legal research re: ability of consumers to revoke consent to be called under TCPA and DNC penalties	440.00	1.2	528.00
Communication	[Gibbs v. SolarCity 05/20/16] Patrick Peluso: Conference w S Woodrow re complaint and need to retain local coun.	340.00	0.3	102.00
Communication	[Gibbs v. SolarCity 05/20/16] Patrick Peluso: Conference with S Coleman about local counsel	340.00	0.3	102.00
Research	[Gibbs v. SolarCity 05/20/16] Patrick Peluso: Legal research regarding telemarketing rule that there needs to be a second call at least 30 days after the first call (1.2) and conference with S Coleman to verify this is met by our clients (.2)	340.00	1.4	476.00
Research	[Gibbs v. SolarCity 05/20/16] Steven Woodrow: Review TCPA decisions from crts in the 1st Cir. incl. D.Mass, D.RI., and D.N.H. caselaw re: unsolicited faxes and phone calls	440.00	1.3	572.00
Communication	[Gibbs v. SolarCity 05/20/16] Steven Woodrow: Conf w/ P.Peluso re: allegations of complaint and obtaining local counsel	440.00	0.3	132.00
Research	[Gibbs v. SolarCity 05/20/16] Steven Woodrow: Research re: C.Sarchio, litigation counsel for SolarCity	440.00	1.1	484.00
Communication	[Gibbs v. SolarCity 05/22/16] Patrick Peluso: Review email from S Coleman containing allegation he'd like to add to Complaint	340.00	0.2	68.00
Communication	[Gibbs v. SolarCity 05/22/16] Steven Woodrow: Conf w/ S.Coleman re: factual allegations supporting DNC claims for C.Gibbs	440.00	0.6	264.00
Pleadings, Motions, or other Writing	[Gibbs v. SolarCity 05/23/16] Patrick Peluso: Review and analyze S Coleman's edits to draft complaint	340.00	0.8	272.00
Communication	[Gibbs v. SolarCity 05/24/16] Patrick Peluso: Conference with J Tolek re serving as local counsel	340.00	0.5	170.00

Task	Time Entry Notes	Rate	Hours	Line Total
Research	[Gibbs v. SolarCity 05/24/16] Steven Woodrow: Online research re: SolarCity company info. and business model (.8) & compls. re: calls (.7)	440.00	1.5	660.00
General	[Gibbs v. SolarCity 05/24/16] Steven Woodrow: Pacer research re: lawsuits vs. SolarCity and online research re: complaints re: SolarCity: review Morris action: Order denying MTD (.8); discovery dispute letters of 4/16 (1.1)	440.00	1.9	836.00
Communication	[Gibbs v. SolarCity 05/25/16] Patrick Peluso: Conference with S Woodrow and S Coleman re situation of our plaintiff	340.00	0.4	136.00
Communication	[Gibbs v. SolarCity 05/25/16] Steven Woodrow: Conf w/ S.Coleman re: plaintiffs facts	440.00	0.4	176.00
Research	[Gibbs v. SolarCity 05/25/16] Steven Woodrow: Review blogposts re: Robins v. Spokeo and impact on TCPA litigation in prep for filing of Gibbs case vs. SolarCity	440.00	0.7	308.00
Communication	[Gibbs v. SolarCity 05/30/16] Steven Woodrow: Conf w/ S. Coleman re: potential impact of Spokeo on TCPA claims	440.00	0.6	264.00
Pleadings, Motions, or other Writing	[Gibbs v. SolarCity 05/31/16] Patrick Peluso: Further edits and revisions to the complaint	340.00	1.6	544.00
Research	[Gibbs v. SolarCity 05/31/16] Patrick Peluso: Researching potential state law or common law claims we can add to bolster the SC complaint	340.00	3.2	1,088.00
Pleadings, Motions, or other Writing	[Gibbs v. SolarCity 05/31/16] Steven Woodrow: further edits to Complaint prior to filing	440.00	0.4	176.00
Communication	[Gibbs v. SolarCity 06/01/16] Patrick Peluso: Conference with S Coleman re local counsel	340.00	0.2	68.00
Pleadings, Motions, or other Writing	[Gibbs v. SolarCity 06/01/16] Patrick Peluso: Reviewing filed complaint	340.00	0.3	102.00
Pleadings, Motions, or other Writing	[Gibbs v. SolarCity 06/01/16] Steven Woodrow: Final review of Class Action Complaint prior to filing	440.00	1.3	572.00
Communication	[Gibbs v. SolarCity 06/02/16] Patrick Peluso: Conference with S Woodrow regarding his research into judicial assignment	340.00	0.4	136.00
Research	[Gibbs v. SolarCity 06/02/16] Patrick Peluso: Review local rules of District of Mass.	340.00	1.5	510.00
Pleadings, Motions, or other Writing	[Gibbs v. SolarCity 06/02/16] Patrick Peluso: Review notice of case assignment	340.00	0.2	68.00
Pleadings, Motions, or other Writing	[Gibbs v. SolarCity 06/02/16] Patrick Peluso: Review notice of case transfer to Worcester	340.00	0.2	68.00
Pleadings, Motions, or other Writing	[Gibbs v. SolarCity 06/02/16] Patrick Peluso: Review and revise draft pro hac vice motions	340.00	0.6	204.00
Pleadings, Motions, or other Writing	[Gibbs v. SolarCity 06/02/16] Patrick Peluso: Review notice of transfer receipt	340.00	0.2	68.00

Task	Time Entry Notes	Rate	Hours	Line Total
Research	[Gibbs v. SolarCity 06/02/16] Steven Woodrow: Review and analyze judicial assignment of District Judge Saris and Magistrate Judge Dein (review for prior TCPA litigation and class action cases and decisions)	440.00	1.8	792.00
General	[Gibbs v. SolarCity 06/02/16] Steven Woodrow: Review transfer to Central Division	440.00	0.2	88.00
Research	[Gibbs v. SolarCity 06/03/16] Steven Woodrow: Review Western division judges for potential assignment	440.00	0.7	308.00
Research	[Gibbs v. SolarCity 06/07/16] Steven Woodrow: Review local rules	440.00	0.7	308.00
Communication	[Gibbs v. SolarCity 06/16/16] Patrick Peluso: Conference with J Tolek regarding filings thus far in the SolarCity case	340.00	0.2	68.00
Pleadings, Motions, or other Writing	[Gibbs v. SolarCity 06/16/16] Patrick Peluso: Arranging for SolarCity service	340.00	0.3	102.00
Communication	[Gibbs v. SolarCity 06/17/16] Patrick Peluso: Conference with S Woodrow and S Coleman re SolarCity filed Compl	340.00	0.4	136.00
Communication	[Gibbs v. SolarCity 06/17/16] Steven Woodrow: Conf. w/ S.Coleman re: status of SolarCity case: review filed pleadings and conf re: service	440.00	0.4	176.00
Communication	[Gibbs v. SolarCity 06/23/16] Patrick Peluso: Conference with S Woodrow re service	340.00	0.2	68.00
General	[Gibbs v. SolarCity 06/24/16] Steven Woodrow: F/u re: items from SColman conf. of 6.17 re: status of case and service and strategy for early approach	440.00	0.4	176.00
Research	[Gibbs v. SolarCity 06/24/16] Steven Woodrow: Review and analyze SolarCity's Answer in Morris action filed 6/15/16 (Morris Dkt. 71)	440.00	0.7	308.00
Research	[Gibbs v. SolarCity 06/28/16] Steven Woodrow: Review docket in Morris action	440.00	0.5	220.00
Communication	[Gibbs v. SolarCity 07/07/16] Patrick Peluso: Conf with S Woodrow regarding service of process on SolarCity	340.00	0.3	102.00
Communication	[Gibbs v. SolarCity 07/07/16] Steven Woodrow: Conf w/ P.Peluso re: service of SolarCity Complaint	440.00	0.3	132.00
Communication	[Gibbs v. SolarCity 07/12/16] Steven Woodrow: Conf w/ R.Lusky, counsel for SolarCity, re: extension of time to respond to complaint	440.00	0.2	88.00
Communication	[Gibbs v. SolarCity 07/12/16] Steven Woodrow: Review and analyze email from SolarCity's local counsel re: extension of time: review email and approve draft stipulation via email to local counsel cc-ing defense counsel	440.00	0.1	44.00
Communication	[Gibbs v. SolarCity 07/12/16] Steven Woodrow: Conf w/ local counsel J.Tolek re: filing of stipulation	440.00	0.4	176.00

Task	Time Entry Notes	Rate	Hours	Line Total
Communication	[Gibbs v. SolarCity 07/14/16] Patrick Peluso: Conference w S Woodrow re magistrate judge consent/non-consent in SolarCity	340.00	0.3	102.00
Communication	[Gibbs v. SolarCity 07/14/16] Patrick Peluso: Conference with J Tolek regarding declination of magistrate form	340.00	0.3	102.00
Communication	[Gibbs v. SolarCity 07/14/16] Patrick Peluso: Review and analyze email from John Mirick regarding magistrate consent	340.00	0.3	102.00
Communication	[Gibbs v. SolarCity 07/14/16] Steven Woodrow: Conf w/ OA and local counsel re: consent to proceed before magistrate	440.00	0.4	176.00
Research	[Gibbs v. SolarCity 07/14/16] Steven Woodrow: Research re: civil cases decided by Magistrate Judge Hennessey	440.00	0.8	352.00
Communication	[Gibbs v. SolarCity 07/14/16] Steven Woodrow: Conf w/ P.Peluso re: Magistrate and SolarCity's position	440.00	0.3	132.00
Pleadings, Motions, or other Writing	[Gibbs v. SolarCity 07/15/16] Steven Woodrow: Review and analyze Morris Plaintiffs Motion to appoint interim Lead Counsel (Dkt. 76)	440.00	0.6	264.00
Communication	[Gibbs v. SolarCity 07/21/16] Patrick Peluso: Review email from S Woodrow forwarding email from R Luskey regarding possible 7/26 deadline in the case raised by Luskey	340.00	0.2	68.00
Communication	[Gibbs v. SolarCity 07/21/16] Patrick Peluso: Review email from R Luskey regarding Morris case's interim counsel motion	340.00	0.2	68.00
Pleadings, Motions, or other Writing	[Gibbs v. SolarCity 07/21/16] Patrick Peluso: Review docket to determine whether there's a 7/26 deadline in the case	340.00	0.4	136.00
Pleadings, Motions, or other Writing	[Gibbs v. SolarCity 07/21/16] Patrick Peluso: Review and analyze Bursor motion to be appointed interim class counsel	340.00	1.6	544.00
Research	[Gibbs v. SolarCity 07/21/16] Patrick Peluso: Legal research into ramifications of Bursor's interim counsel motion if granted	340.00	3.7	1,258.00
Communication	[Gibbs v. SolarCity 07/21/16] Patrick Peluso: Conference with S Woodrow regarding Luskey email	340.00	0.4	136.00
Research	[Gibbs v. SolarCity 07/21/16] Steven Woodrow: Review and analyze Motion for Appt of Interim Lead Counsel filed by Bursor & Fisher in the Morris action	440.00	1.2	528.00
Communication	[Gibbs v. SolarCity 07/21/16] Steven Woodrow: Email exchange w/ R.Luskey re: status	440.00	0.2	88.00
Communication	[Gibbs v. SolarCity 07/21/16] Steven Woodrow: Further phone call w/ R. Luskey re: Morris action, interplay with Gibbs, filings in Morris	440.00	0.4	176.00
Communication	[Gibbs v. SolarCity 07/26/16] Patrick Peluso: Review email forwarded by J Tolek from J Arisohn regarding planned motion to intervene	340.00	0.3	102.00

Task	Time Entry Notes	Rate	Hours	Line Total
Research	[Gibbs v. SolarCity 07/26/16] Patrick Peluso: Reviewing local rule 7.1(a)(2), referenced in Arisohn's email regarding planned motion to intervene	340.00	0.2	68.00
Communication	[Gibbs v. SolarCity 07/26/16] Patrick Peluso: Email exchange with J Arisohn regarding meeting and conferring re planned motion to intervene in our case	340.00	0.4	136.00
Communication	[Gibbs v. SolarCity 07/26/16] Patrick Peluso: Email exchange with J Tolek re whether she needs to participate in the meet-and-confer	340.00	0.2	68.00
Communication	[Gibbs v. SolarCity 07/26/16] Steven Woodrow: Conf w. local counsel re: call received from J.Arisohn re: SolarCity lawsuit	440.00	0.2	88.00
Research	[Gibbs v. SolarCity 07/26/16] Steven Woodrow: Review J.Arisohn's experience in civil and class litigation	440.00	0.2	88.00
Pleadings, Motions, or other Writing	[Gibbs v. SolarCity 07/27/16] Patrick Peluso: Preparing mine and S Woodrow's pro hac motions for filing	340.00	0.8	272.00
Communication	[Gibbs v. SolarCity 07/27/16] Patrick Peluso: Conference with J Tolek re pro hac motions	340.00	0.2	68.00
Research	[Gibbs v. SolarCity 07/27/16] Patrick Peluso: Review and analyze motion to dismiss filed in Morris case, (2.7) response (2.4), and reply (1.2)	340.00	6.3	2,142.00
Communication	[Gibbs v. SolarCity 07/27/16] Steven Woodrow: Conf call w/ J.Arisohn re: relationship between Gibbs case and allegations in Lucero case that he had filed	440.00	0.4	176.00
Pleadings, Motions, or other Writing	[Gibbs v. SolarCity 07/28/16] Patrick Peluso: Review and analyze filed Motion to intervene	340.00	2.1	714.00
Research	[Gibbs v. SolarCity 07/28/16] Patrick Peluso: Review and analyze Morris discovery letters filed in April 2016 and the discovery order re the dispute	340.00	1.2	408.00
Research	[Gibbs v. SolarCity 07/28/16] Patrick Peluso: Review and analyze SolarCity's answer to 2nd amended complaint (1.4), and the 2nd amended complaint itself in Morris (2.4)	340.00	3.8	1,292.00
Research	[Gibbs v. SolarCity 07/28/16] Patrick Peluso: Initial research into case law cited by Bursor firm in motion to intervene/transfer	340.00	2.3	782.00
Pleadings, Motions, or other Writing	[Gibbs v. SolarCity 07/28/16] Steven Woodrow: Review and analyze Motion to Transfer filed by J.Arisohn on behalf of the Morris Plaintiffs	440.00	0.8	352.00
Research	[Gibbs v. SolarCity 07/28/16] Steven Woodrow: Review caselaw cited by Morris Plaintiff's in Motion to Intervene	440.00	0.7	308.00
Research	[Gibbs v. SolarCity 07/29/16] Patrick Peluso: Initial legal research into arguments in motion to intervene	340.00	3.3	1,122.00
Pleadings, Motions, or other Writing	[Gibbs v. SolarCity 07/29/16] Patrick Peluso: Review Order granting pro hac vice admission	340.00	0.2	68.00

Task	Time Entry Notes	Rate	Hours	Line Total
Pleadings, Motions, or other Writing	[Gibbs v. SolarCity 07/29/16] Patrick Peluso: Review Motion to appear pro hac vice filed by Arisohn in our case	340.00	0.2	68.00
Research	[Gibbs v. SolarCity 07/29/16] Patrick Peluso: Factual research into Lead Genesis, Inc., added as D in SolarCity case	340.00	2.2	748.00
Research	[Gibbs v. SolarCity 07/29/16] Patrick Peluso: Legal research re first to file rule	340.00	2.3	782.00
Pleadings, Motions, or other Writing	[Gibbs v. SolarCity 07/29/16] Steven Woodrow: Review pro hac vice application prior to filing and order granting pro hac admission	440.00	0.3	132.00
Communication	[Gibbs v. SolarCity 07/29/16] Steven Woodrow: Conf w/ P.Peluso re: Motion to Intervene	440.00	0.4	176.00
Research	[Gibbs v. SolarCity 07/30/16] Steven Woodrow: Legal research re: standards for permissive intervention	440.00	1.2	528.00
Research	[Gibbs v. SolarCity 08/01/16] Patrick Peluso: Legal research regarding "reverse auctions", whether that's grounds for a transfer, and whether you can even have that scenario when no one is discussing settlement	340.00	3.4	1,156.00
Communication	[Gibbs v. SolarCity 08/02/16] Patrick Peluso: Conferral with J Arisohn regarding his anticipated motion to appear phv (no objection)	340.00	0.4	136.00
Research	[Gibbs v. SolarCity 08/02/16] Patrick Peluso: Legal research re duty of counsel seeking lead to show "Leadership" and work cooperatively	340.00	1.7	578.00
Communication	[Gibbs v. SolarCity 08/02/16] Steven Woodrow: Conf w/ J.Arisohn re: filing of pro hac vice application in Gibbs matter	440.00	0.2	88.00
Communication	[Gibbs v. SolarCity 08/02/16] Steven Woodrow: Conf and email exchange w/ C.Sarchio re: intervenor motion and proposed intervenors	440.00	0.3	132.00
Pleadings, Motions, or other Writing	[Gibbs v. SolarCity 08/03/16] Patrick Peluso: Review Order granting Arisohn pro hac	340.00	0.2	68.00
Pleadings, Motions, or other Writing	[Gibbs v. SolarCity 08/03/16] Steven Woodrow: Further legal research re: intervention: intervention as of right (.5); review legal authorities re: first-to-file rule (.7)	440.00	1.2	528.00
Pleadings, Motions, or other Writing	[Gibbs v. SolarCity 08/04/16] Steven Woodrow: Review and analyze SolarCity opposition to appointment of interim lead counsel (Morris dkt. 81)	440.00	0.5	220.00
Communication	[Gibbs v. SolarCity 08/08/16] Patrick Peluso: Conference with S Woodrow re our need for additional time to respond to motion to intervene/transfer	340.00	0.3	102.00
Communication	[Gibbs v. SolarCity 08/08/16] Patrick Peluso: Conferral with SC and Morris counsel regarding anticipated motion for more time	340.00	0.5	170.00



Task	Time Entry Notes	Rate	Hours	Line Total
Communication	[Gibbs v. SolarCity 08/08/16] Steven Woodrow: Conf w/ J.Arisohn re: additional time to respond to Motion to Intervene and respond to concerns raised of reverse auction (.4); conf. w/ P.Peluso and C.Sarchio re: reverse auction and absence of current settlement discussions (.9)	440.00	1.3	572.00
Research	[Gibbs v. SolarCity 08/08/16] Steven Woodrow: Legal research re: reverse auctions in competing class actions (In re M3 Power Razor; Lupron; Celexa and Lexapro MDLs; Gulbankian v. MW Mfrs., Inc.)	440.00	2.7	1,188.00
Communication	[Gibbs v. SolarCity 08/09/16] Steven Woodrow: Further email exchange and discussion re: Arisohn objections to motion for additional time to respond to motion to intervene (.6); conf w/ P.Peluso re: intervention opposition (.7)	440.00	1.3	572.00
Pleadings, Motions, or other Writing	[Gibbs v. SolarCity 08/10/16] Patrick Peluso: Preparing declaration motion for extension of time	340.00	0.5	170.00
Pleadings, Motions, or other Writing	[Gibbs v. SolarCity 08/10/16] Patrick Peluso: Preparing motion for extension of time	340.00	0.7	238.00
Pleadings, Motions, or other Writing	[Gibbs v. SolarCity 08/10/16] Patrick Peluso: Compiling exhibits motion for extension of time	340.00	0.4	136.00
Pleadings, Motions, or other Writing	[Gibbs v. SolarCity 08/10/16] Patrick Peluso: Review and analyze opposition to motion intervene filed by SolarCity along with the 14 exhibits	340.00	5.3	1,802.00
Communication	[Gibbs v. SolarCity 08/10/16] Steven Woodrow: Conf w/ local counsel re: Motion for Additional time to respond to Motion to Intervene and objections lodged by J. Arisohn	440.00	0.8	352.00
Pleadings, Motions, or other Writing	[Gibbs v. SolarCity 08/10/16] Steven Woodrow: Edit draft motion for additional time prior to filing	440.00	0.7	308.00
Pleadings, Motions, or other Writing	[Gibbs v. SolarCity 08/10/16] Steven Woodrow: Review and analyze SolarCity's response in Opposition to Proposed-Intervenor's Motion to Intervene: review and analyze Motion and Exhibits A-N	440.00	2.7	1,188.00
Pleadings, Motions, or other Writing	[Gibbs v. SolarCity 08/11/16] Patrick Peluso: Review motion to appear pro hac vice filed by E Echtman	340.00	0.2	68.00
Research	[Gibbs v. SolarCity 08/11/16] Steven Woodrow: Review Ranger v. T-Mobile and other authorities re: competing class actions and intervention, motions to transfer	440.00	3.3	1,452.00
Communication	[Gibbs v. SolarCity 08/12/16] Patrick Peluso: Participate with conference with lawyers for SolarCity	340.00	0.4	136.00
Pleadings, Motions, or other Writing	[Gibbs v. SolarCity 08/12/16] Patrick Peluso: Review order granting E Echtman pro hac	340.00	0.2	68.00
Pleadings, Motions, or other Writing	[Gibbs v. SolarCity 08/12/16] Patrick Peluso: Review notice of appearance filed by E Zelnick	340.00	0.2	68.00

Task	Time Entry Notes	Rate	Hours	Line Total
Communication	[Gibbs v. SolarCity 08/12/16] Patrick Peluso: Review and analyze opposition to interim lead counsel filed by SolarCity in Morris case	340.00	0.7	238.00
Pleadings, Motions, or other Writing	[Gibbs v. SolarCity 08/12/16] Patrick Peluso: Review motion to dismiss docket entry filed by SCity	340.00	0.3	102.00
Pleadings, Motions, or other Writing	[Gibbs v. SolarCity 08/12/16] Patrick Peluso: Meet and confer with SCity regarding anticipated MTD	340.00	0.4	136.00
Communication	[Gibbs v. SolarCity 08/12/16] Steven Woodrow: Conf w/ OA for SolarCity re: SolarCity's intended and forthcoming Motions to Dismiss the Class Action Complaint	440.00	0.3	132.00
Communication	[Gibbs v. SolarCity 08/12/16] Steven Woodrow: Conf call w/ lawyers for SolarCity	440.00	0.4	176.00
Pleadings, Motions, or other Writing	[Gibbs v. SolarCity 08/15/16] Patrick Peluso: Review and analyze Solarcity's motions to dismiss	340.00	4.6	1,564.00
Communication	[Gibbs v. SolarCity 08/15/16] Patrick Peluso: Conference with S Woodrow re SolarCity's motions	340.00	0.3	102.00
Research	[Gibbs v. SolarCity 08/15/16] Patrick Peluso: Legal research into recent developments post-Spokeo re standing in TCPA cases	340.00	3.9	1,326.00
Pleadings, Motions, or other Writing	[Gibbs v. SolarCity 08/15/16] Steven Woodrow: Review and analyze SolarCity's Rule 12(b)(1) and 12(b)(6) Motion to Dismiss	440.00	2.6	1,144.00
Communication	[Gibbs v. SolarCity 08/15/16] Steven Woodrow: Conf w/ P.Peluso re: args. raised by SolarCity in MTD and proposed response	440.00	0.3	132.00
Research	[Gibbs v. SolarCity 08/15/16] Steven Woodrow: Legal research re: standard for intervention in competing class actions, review Ranger v. T-Mobile	440.00	0.7	308.00
Research	[Gibbs v. SolarCity 08/16/16] Patrick Peluso: Initial legal research re motions to dismiss filed by SC, (12(b)(6) component)	340.00	1.9	646.00
Research	[Gibbs v. SolarCity 08/16/16] Patrick Peluso: Legal research into what courts have been saying about actual damages in the TCPA context	340.00	3.2	1,088.00
Research	[Gibbs v. SolarCity 08/16/16] Patrick Peluso: Legal research into properly pleading nuisance and invasion of privacy allegations	340.00	1.6	544.00
Research	[Gibbs v. SolarCity 08/16/16] Steven Woodrow: Review pleadings in Morris action and compare to pleadings in Gibbs and Colby case in prep. for response to Mtn to Intervene	440.00	1.6	704.00
Communication	[Gibbs v. SolarCity 08/16/16] Steven Woodrow: Review and analyze cases cited by SolarCity in its Rule 12(b)(1) MTD	440.00	2.3	1,012.00
Research	[Gibbs v. SolarCity 08/17/16] Patrick Peluso: Legal research regarding SolarCity's novel "3rd call" theory	340.00	5.1	1,734.00

Task	Time Entry Notes	Rate	Hours	Line Total
Pleadings, Motions, or other Writing	[Gibbs v. SolarCity 08/17/16] Steven Woodrow: Draft and revise introduction and statement of facts for Opposition to SolarCity's Rule 12(b)(1) Motion to Dismiss	440.00	3.3	1,452.00
Pleadings, Motions, or other Writing	[Gibbs v. SolarCity 08/18/16] Steven Woodrow: Further drafting of outline of argument section for opposition to SolarCity's Rule 12(b)(1) and 12(b)(6) MTD	440.00	1.8	792.00
Research	[Gibbs v. SolarCity 08/18/16] Steven Woodrow: Legal Research: review SolarCity cases cited in support of its Rule 12(b)(6) arguments	440.00	2.7	1,188.00
Pleadings, Motions, or other Writing	[Gibbs v. SolarCity 08/19/16] Steven Woodrow: Drafting of Opposition to Motion to Intervene and Motion to Transfer: re-review and analyze filings of proposed intervenors (1.8); draft proposed argument outline (2.7); review filings in Morris action and claims (2.0)	440.00	6.5	2,860.00
Research	[Gibbs v. SolarCity 08/19/16] Steven Woodrow: Research 1st Cir. law on intervention in competing class actions	440.00	2.3	1,012.00
Pleadings, Motions, or other Writing	[Gibbs v. SolarCity 08/20/16] Steven Woodrow: Further drafting of opposition to Motion to Intervene: revise and edit introduction and statement of facts	440.00	4.2	1,848.00
Pleadings, Motions, or other Writing	[Gibbs v. SolarCity 08/22/16] Steven Woodrow: Drafting and editing of proposed fact section for Opposition to Rule 12(b)(1) and Rule 12(b)(6) MTD (2.4); review cases in wake of Spokeo (1.7) (Aranda, Mey, Krakauer), revise introduction (.8); review argument structure and outline (1.5)	440.00	6.4	2,816.00
Communication	[Gibbs v. SolarCity 08/23/16] Patrick Peluso: Conference with S Woodrow re SolarCity MTD and what we need to do to get into filing shape	340.00	0.7	238.00
Communication	[Gibbs v. SolarCity 08/23/16] Steven Woodrow: Conf w/ P.Peluso re: Opp. to SolarCity MTD and editing process	440.00	0.7	308.00
Pleadings, Motions, or other Writing	[Gibbs v. SolarCity 08/23/16] Steven Woodrow: Draft and revise proposed Opposition to Motion to Intervene and Motion to Transfer: draft and revise introduction (.8); draft arg. re: timeliness of intervention (1.9); draft and revise background facts and procedural history section (3.8); draft arg. re: proposed intervenors lack of interest in the case (1.3)	440.00	7.8	3,432.00
Pleadings, Motions, or other Writing	[Gibbs v. SolarCity 08/24/16] Steven Woodrow: Continued drafting and editing of Opposition to SolarCity's MTD: review TCPA cases for standing decisions in the wake of Spokeo (3.3); revise Spokeo argument (2.7); draft and revise arg. re: invasions of privacy (1.8)	440.00	7.8	3,432.00
Communication	[Gibbs v. SolarCity 08/25/16] Patrick Peluso: Participate in conference with our SolarCity clients re case	340.00	0.3	102.00

Task	Time Entry Notes	Rate	Hours	Line Total
Pleadings, Motions, or other Writing	[Gibbs v. SolarCity 08/25/16] Steven Woodrow: Further editing of Opposition to SolarCity Motion to Dismiss: draft and edit do not call arguments (2.6); revise fact section (3.2); review and address Loreda declaration filed in support of dismissal (.9)	440.00	6.7	2,948.00
Communication	[Gibbs v. SolarCity 08/25/16] Steven Woodrow: Conf w/ clients re: case update	440.00	0.3	132.00
Pleadings, Motions, or other Writing	[Gibbs v. SolarCity 08/26/16] Patrick Peluso: Review edit, and revise S Woodrow's draft of SCity's MTD	340.00	1.7	578.00
Pleadings, Motions, or other Writing	[Gibbs v. SolarCity 08/26/16] Steven Woodrow: Final review of Opposition to Motion to Dismiss prior to filing: edit and revise introduction and facts (2.2); revise arg. re: Spokeo and Art. III standing (1.3); revise arg. re: invasion of privacy (.7); revise do not call arguments (1.1)	440.00	5.3	2,332.00
Pleadings, Motions, or other Writing	[Gibbs v. SolarCity 08/26/16] Steven Woodrow: Further drafting of opposition to Motion to Intervene: revise arg. section re: intervention as of right	440.00	2.4	1,056.00
Pleadings, Motions, or other Writing	[Gibbs v. SolarCity 08/27/16] Steven Woodrow: Finalize initial draft of opposition to intervention and forward to P.Peluso for editing	440.00	1.1	484.00
Communication	[Gibbs v. SolarCity 08/28/16] Patrick Peluso: Conference with S Woodrow re opp to mot. intervene	340.00	0.2	68.00
Pleadings, Motions, or other Writing	[Gibbs v. SolarCity 08/28/16] Steven Woodrow: Further editing and revisions to draft Opposition to Motion to Intervene and Motion to Transfer: draft and revise arg. re: intervention under Rule 24(c) (3.4); draft arg. re: adequacy of counsel to protect rights of absent class members (1.7); revise arg. re: premature nature of intervention (2.2)	440.00	7.3	3,212.00
Communication	[Gibbs v. SolarCity 08/28/16] Steven Woodrow: Conf. w/ P.Peluso re: edits to Opposition to Motion to Intervene	440.00	0.2	88.00
Pleadings, Motions, or other Writing	[Gibbs v. SolarCity 08/29/16] Patrick Peluso: Initial review and edits of S Woodrow's opp Mot Intervene/transfer brief	340.00	3.6	1,224.00
Pleadings, Motions, or other Writing	[Gibbs v. SolarCity 08/29/16] Steven Woodrow: Further drafting of Opposition to Motion to Intervene and Transfer: revise introduction (.8); draft arg. explaining risk of reverse auction (3.8); revise arg. re: intervenor's interest in case (1.4); revise chart highlighting differences in the pleadings (1.9)	440.00	7.9	3,476.00
Communication	[Gibbs v. SolarCity 08/30/16] Patrick Peluso: Conference with S Woodrow re opp to motion transfer/intervene	340.00	0.3	102.00
Communication	[Gibbs v. SolarCity 08/30/16] Steven Woodrow: Conf w/ P.Peluso re: drafting of Opposition to Motion to Intervene and Transfer	440.00	0.3	132.00
Research	[Gibbs v. SolarCity 08/30/16] Steven Woodrow: Review 1st Cir. cases re: transfer of competing class actions	440.00	1.8	792.00

Task	Time Entry Notes	Rate	Hours	Line Total
Research	[Gibbs v. SolarCity 08/30/16] Steven Woodrow: Legal research re: application of first to file rule	440.00	1.3	572.00
Pleadings, Motions, or other Writing	[Gibbs v. SolarCity 08/30/16] Steven Woodrow: Draft and revise arg section re: permissive intervention and transfer	440.00	3.3	1,452.00
Pleadings, Motions, or other Writing	[Gibbs v. SolarCity 08/30/16] Steven Woodrow: Revise draft declaration in support of opposition to motion to intervene	440.00	0.6	264.00
Pleadings, Motions, or other Writing	[Gibbs v. SolarCity 08/31/16] Patrick Peluso: Revising draft brief re motion to intervene/transfer	340.00	4.4	1,496.00
Pleadings, Motions, or other Writing	[Gibbs v. SolarCity 08/31/16] Patrick Peluso: Drafting declaration re motion to intervene/transfer and compiling exhibit	340.00	0.5	170.00
Pleadings, Motions, or other Writing	[Gibbs v. SolarCity 08/31/16] Steven Woodrow: Final review of Opposition to Motion to Intervene and Motion to Transfer prior to filing: review and edit introduction and facts (3.7); revise section re: adequacy of counsel (1.7); revise arg. re: reverse auction (2.2); review brief for spelling, grammar, punctuation and form prior to filing (.8)	440.00	8.4	3,696.00
Research	[Gibbs v. SolarCity 09/01/16] Steven Woodrow: Review and analyze Order appointing lead counsel	440.00	0.3	132.00
Communication	[Gibbs v. SolarCity 09/02/16] Steven Woodrow: Conf w/ P.Peluso re: appointment of interim lead counsel in Morris action	440.00	0.6	264.00
Research	[Gibbs v. SolarCity 09/07/16] Steven Woodrow: Review filings in Lucero case and check on status	440.00	0.6	264.00
Pleadings, Motions, or other Writing	[Gibbs v. SolarCity 09/08/16] Patrick Peluso: Review SolarCity's Motion for leave to file reply re intervene/transfer motion	340.00	0.4	136.00
Communication	[Gibbs v. SolarCity 09/08/16] Patrick Peluso: Conferral with SCity regarding its anticipated motion to file reply	340.00	0.2	68.00
Communication	[Gibbs v. SolarCity 09/08/16] Steven Woodrow: Review and respond to email from counsel for SolarCity re: filing of Reply brief	440.00	0.2	88.00
Research	[Gibbs v. SolarCity 09/09/16] Steven Woodrow: Review Tesla shareholder litigation re: merger w/ SolarCity and analyze impact on litigation	440.00	0.8	352.00
Communication	[Gibbs v. SolarCity 09/12/16] Patrick Peluso: Conference with Woodrow re Solarcity reply brief MTD	340.00	0.3	102.00
Pleadings, Motions, or other Writing	[Gibbs v. SolarCity 09/12/16] Patrick Peluso: Reviewing order granting motion for leave to file reply	340.00	0.2	68.00
Pleadings, Motions, or other Writing	[Gibbs v. SolarCity 09/12/16] Patrick Peluso: Review and analyze SolarCity Reply	340.00	2.2	748.00
Pleadings, Motions, or other Writing	[Gibbs v. SolarCity 09/12/16] Steven Woodrow: Review and analyze SolarCity's Reply in support of its Rule 12(b)(1) and 12(b)(6) motions to dismiss	440.00	1.1	484.00

Task	Time Entry Notes	Rate	Hours	Line Total
Communication	[Gibbs v. SolarCity 09/12/16] Steven Woodrow: Conf w/ P.Peluso re: SolarCity reply briefing in supp. of MTD	440.00	0.3	132.00
Communication	[Gibbs v. SolarCity 09/14/16] Patrick Peluso: Participate in conference with SolarCity clients	340.00	0.2	68.00
Communication	[Gibbs v. SolarCity 09/14/16] Steven Woodrow: Conf w/ clients re: case update	440.00	0.2	88.00
Research	[Gibbs v. SolarCity 09/26/16] Steven Woodrow: Review articles re: Tesla shareholder litigation and potential halting of SolarCity acquisition; analyze impact on litigation	440.00	0.4	176.00
Pleadings, Motions, or other Writing	[Gibbs v. SolarCity 10/04/16] Patrick Peluso: Review and analyze declaration of T Fisher filed in Morris ISO motion to be appointed interim lead	340.00	1.3	442.00
Communication	[Gibbs v. SolarCity 10/04/16] Steven Woodrow: Email exchange w/ SolarCity counsel re: reverse auctions (and absence here given no talks of settlement with Bursor)(.4) and mediation w/ Judge Denlow (.3)	440.00	0.7	308.00
Research	[Gibbs v. SolarCity 10/04/16] Steven Woodrow: Review and analyze Order appointing interim lead counsel in Lucero/Morris case	440.00	0.8	352.00
Research	[Gibbs v. SolarCity 10/06/16] Steven Woodrow: Review Lucero docket	440.00	0.7	308.00
Communication	[Gibbs v. SolarCity 10/12/16] Steven Woodrow: Conf w/ P.Peluso re: reverse auctions in prep. for argument	440.00	0.6	264.00
General	[Gibbs v. SolarCity 10/12/16] Steven Woodrow: Review and analyze latest status report in Morris/Lucero action	440.00	0.5	220.00
Research	[Gibbs v. SolarCity 10/13/16] Steven Woodrow: Further review and analysis of status of Lucero case, including pleadings (judging for overlap) and amendments	440.00	0.8	352.00
Communication	[Gibbs v. SolarCity 10/14/16] Patrick Peluso: Conference w S Woodrow re hearing in Worcester on Mot Intervene/Transfer	340.00	0.3	102.00
Pleadings, Motions, or other Writing	[Gibbs v. SolarCity 10/14/16] Patrick Peluso: Review Notice of hearing, setting hearings on both pending motions for 12/8 in Worcester	340.00	0.2	68.00
Communication	[Gibbs v. SolarCity 10/14/16] Steven Woodrow: Conf w/ P.Peluso re: court hearing in SolarCity case on Motion to Intervene and Motion to Transfer	440.00	0.3	132.00
General	[Gibbs v. SolarCity 10/17/16] Steven Woodrow: Review latest filings on Morris docket	440.00	0.8	352.00
General	[Gibbs v. SolarCity 10/20/16] Steven Woodrow: Review claims of Hall and Lucero as set forth in SAC in action pending in ND CA	440.00	1.1	484.00

Task	Time Entry Notes	Rate	Hours	Line Total
Research	[Gibbs v. SolarCity 10/25/16] Steven Woodrow: Review SolarCity financials for 2014 outlook	440.00	1.1	484.00
Communication	[Gibbs v. SolarCity 10/26/16] Steven Woodrow: Conf. w/ counsel for SolarCity	440.00	0.3	132.00
Communication	[Gibbs v. SolarCity 10/27/16] Patrick Peluso: Conference with SolarCity clients about what's going on in the case	340.00	0.3	102.00
Communication	[Gibbs v. SolarCity 10/27/16] Steven Woodrow: Conf w/ clients re: case update	440.00	0.3	132.00
Research	[Gibbs v. SolarCity 10/27/16] Steven Woodrow: Review Tesla SEC filings	440.00	0.6	264.00
Communication	[Gibbs v. SolarCity 10/31/16] Steven Woodrow: Conf w/ P.Peluso re: pending motions	440.00	0.4	176.00
Communication	[Gibbs v. SolarCity 10/31/16] Steven Woodrow: Conf w/ counsel for SolarCity re: terms of proposed mediation and inclusion of all parties	440.00	0.2	88.00
Settlement	[Gibbs v. SolarCity 11/01/16] Patrick Peluso: Conf with S Woodrow and P Peluso re mediation strategy	340.00	0.4	136.00
Communication	[Gibbs v. SolarCity 11/01/16] Patrick Peluso: Review and analyze SolarCity invitation to mediate email	340.00	0.5	170.00
Settlement	[Gibbs v. SolarCity 11/01/16] Steven Woodrow: Review and analyze email from SolarCity re: mediation with Judge Denlow (.2); strategy conf. w/ P.Peluso and S.Coleman (.4)	440.00	0.6	264.00
Communication	[Gibbs v. SolarCity 11/01/16] Steven Woodrow: Conf w/ clients re: lawsuit	440.00	0.3	132.00
Communication	[Gibbs v. SolarCity 11/01/16] Steven Woodrow: Conf w/ S. Coleman re: strategy re: argument opposing transfer and intervention	440.00	0.3	132.00
Communication	[Gibbs v. SolarCity 11/02/16] Patrick Peluso: Review email from S Woodrow to J Arisohn requesting Arisohn's availability to meet and confer regarding offer to mediate extended by SCity	340.00	0.2	68.00
Communication	[Gibbs v. SolarCity 11/02/16] Steven Woodrow: Conf w/ J.Arisohn re: mediation	440.00	0.2	88.00
Communication	[Gibbs v. SolarCity 11/02/16] Steven Woodrow: Conf w/ P.Peluso re: mediation strategy	440.00	0.7	308.00
Communication	[Gibbs v. SolarCity 11/03/16] Steven Woodrow: Review Morris/ Lucero docket re case updates	440.00	0.6	264.00
Communication	[Gibbs v. SolarCity 11/04/16] Steven Woodrow: Draft email to counsel for SolarCity	440.00	0.2	88.00
Research	[Gibbs v. SolarCity 11/15/16] Steven Woodrow: Legal research re: intervention in competing class actions	440.00	0.8	352.00



Task	Time Entry Notes	Rate	Hours	Line Total
Research	[Gibbs v. SolarCity 11/16/16] Steven Woodrow: Review status of Lucero case	440.00	0.7	308.00
Research	[Gibbs v. SolarCity 11/17/16] Patrick Peluso: Reviewing news articles re SolarCity being bought by Tesla	340.00	0.7	238.00
Communication	[Gibbs v. SolarCity 11/18/16] Patrick Peluso: Conference with S Woodrow re opposing intervention strategy	340.00	0.4	136.00
Communication	[Gibbs v. SolarCity 11/18/16] Steven Woodrow: Conf w/ P.Peluso re: strategy for opposing intervention	440.00	0.4	176.00
Research	[Gibbs v. SolarCity 11/23/16] Steven Woodrow: Review docket in Lucero matter	440.00	0.4	176.00
Communication	[Gibbs v. SolarCity 11/23/16] Steven Woodrow: Email to C.Sarchio re: SolarCity litigation (.1); conf w/ P. Peluso re: potential for mediation (.7)	440.00	0.8	352.00
Research	[Gibbs v. SolarCity 11/28/16] Steven Woodrow: Review status of SolarCity shareholder litigation	440.00	0.4	176.00
Communication	[Gibbs v. SolarCity 11/28/16] Steven Woodrow: Conf. w/ P.Peluso re: mediation in January in Chicago	440.00	0.7	308.00
Communication	[Gibbs v. SolarCity 11/30/16] Patrick Peluso: Conference w S Woodrow discussing mediation with Denlow (JAMS Chicago)	340.00	0.3	102.00
Communication	[Gibbs v. SolarCity 11/30/16] Patrick Peluso: Review follow-up email from C Sarchio extending invite to mediation with Denlow on 1/30	340.00	0.2	68.00
Settlement	[Gibbs v. SolarCity 11/30/16] Patrick Peluso: Conference w S Woodrow re Sarchio's mediation invite	340.00	0.4	136.00
Communication	[Gibbs v. SolarCity 11/30/16] Steven Woodrow: Review email from SolarCity counsel re: scheduling of mediation	440.00	0.2	88.00
Communication	[Gibbs v. SolarCity 11/30/16] Steven Woodrow: Conf w/ P.Peluso re: mediation w/ Judge Denlow	440.00	0.3	132.00
Hearings and other Court Appearances	[Gibbs v. SolarCity 12/01/16] Patrick Peluso: Preparing for 12/8 hearing on MTD/intervene and writing outline of argument	340.00	5.7	1,938.00
Hearings and other Court Appearances	[Gibbs v. SolarCity 12/01/16] Steven Woodrow: Outline argument questions for Mock Arg. prep w/ P.Peluso re: MTD and Opp. to Mots. to Intervene and Transfer	440.00	0.8	352.00
Pleadings, Motions, or other Writing	[Gibbs v. SolarCity 12/02/16] Patrick Peluso: Mock oral argument with S Woodrow in advance of 12/8 hearing	340.00	1.1	374.00
Communication	[Gibbs v. SolarCity 12/02/16] Steven Woodrow: Mock oral argument w/ P.Peluso	440.00	1.1	484.00
Communication	[Gibbs v. SolarCity 12/03/16] Patrick Peluso: Conf with Woodrow re SolarCity mediation	340.00	0.4	136.00



Task	Time Entry Notes	Rate	Hours	Line Total
Communication	[Gibbs v. SolarCity 12/03/16] Steven Woodrow: Review and analyze settlement communication re: mediation w/ Judge Denlow and conf w/ P.Peluso re: mediation	440.00	0.4	176.00
Research	[Gibbs v. SolarCity 12/03/16] Steven Woodrow: Review notices of dismissal of Hall and Morris from action pending in ND CA and review of Plaintiff Lucero's claims	440.00	0.6	264.00
Communication	[Gibbs v. SolarCity 12/05/16] Patrick Peluso: Participate in conference with S Coleman/S Woodrow re mediation	340.00	0.4	136.00
Pleadings, Motions, or other Writing	[Gibbs v. SolarCity 12/05/16] Patrick Peluso: Reviewing and analyzing Confirmation of mediation draft agreemnt	340.00	0.3	102.00
Pleadings, Motions, or other Writing	[Gibbs v. SolarCity 12/05/16] Patrick Peluso: Reviewing all relevant filings ahead of 12/8 hearing	340.00	2.3	782.00
Communication	[Gibbs v. SolarCity 12/05/16] Steven Woodrow: Conf. w/ S.Coleman re: mediation	440.00	0.7	308.00
Settlement	[Gibbs v. SolarCity 12/05/16] Steven Woodrow: Review mediation summary prepared for Judge Denlow and comm re: proposed edits	440.00	0.6	264.00
Communication	[Gibbs v. SolarCity 12/05/16] Steven Woodrow: Strategy conf. w/ P.Peluso re: approach to mediation	440.00	0.5	220.00
Communication	[Gibbs v. SolarCity 12/06/16] Patrick Peluso: Strategy talk and practice session with Woodrow re upcoming hearing in Worcester on dispositive motions and motions to transfer/ intervene	340.00	1.3	442.00
Pleadings, Motions, or other Writing	[Gibbs v. SolarCity 12/06/16] Patrick Peluso: Additional review and revisions to argument outline	340.00	1.8	612.00
Communication	[Gibbs v. SolarCity 12/06/16] Steven Woodrow: Strategy session/mock argument w/ P.Peluso prior to hearing on Motion to Dismiss (and motions to transfer and intervene)	440.00	1.3	572.00
Settlement	[Gibbs v. SolarCity 12/06/16] Steven Woodrow: Conf w/ C.Sarchio (.2); conf w/ P.Peluso re: call w/ C.Sarchio (.3)	440.00	0.5	220.00
Communication	[Gibbs v. SolarCity 12/07/16] Patrick Peluso: Further prep session with S Woodrow re SolarCity hearing	340.00	1.1	374.00
Pleadings, Motions, or other Writing	[Gibbs v. SolarCity 12/07/16] Patrick Peluso: Review and analyze corporate disclosure statement filed by SolarCity	340.00	0.4	136.00
Hearings and other Court Appearances	[Gibbs v. SolarCity 12/07/16] Patrick Peluso: Travel to Mass. for hearing on 12/8	340.00	6.5	2,210.00
Pleadings, Motions, or other Writing	[Gibbs v. SolarCity 12/07/16] Patrick Peluso: Additional work on outlining argument for various SC Motions to be heard in 12/8	340.00	3.2	1,088.00
Communication	[Gibbs v. SolarCity 12/07/16] Steven Woodrow: Conf w/ P.Peluso re: oral argument on Motions to Dismiss and Motion to Intervene and Transfer: engage in mock argument and anticipation of likely court questions and issues of concern (1.1)	440.00	1.1	484.00

Task	Time Entry Notes	Rate	Hours	Line Total
General	[Gibbs v. SolarCity 12/07/16] Steven Woodrow: Review corp. disclosure statement for Tesla motors, eval. litigation vs. Tesla	440.00	0.2	88.00
Hearings and other Court Appearances	[Gibbs v. SolarCity 12/08/16] Patrick Peluso: Hearing on MTD and Motion to Intervene/Transfer	340.00	1	340.00
Hearings and other Court Appearances	[Gibbs v. SolarCity 12/08/16] Patrick Peluso: Review and analyze all relevant filings as final prep for 12/8 hearing	340.00	2.2	748.00
Hearings and other Court Appearances	[Gibbs v. SolarCity 12/08/16] Patrick Peluso: Review and revise outline of argument	340.00	2.7	918.00
Hearings and other Court Appearances	[Gibbs v. SolarCity 12/08/16] Patrick Peluso: Review minute entry of 12/8 hearing	340.00	0.2	68.00
Communication	[Gibbs v. SolarCity 12/08/16] Steven Woodrow: Conf. w/ P.Peluso summarizing oral argument on pending motions to intervene and to dismiss	440.00	0.8	352.00
Pleadings, Motions, or other Writing	[Gibbs v. SolarCity 12/09/16] Patrick Peluso: Travel back from Mass. on hearing on 12/8	340.00	5.5	1,870.00
Hearings and other Court Appearances	[Gibbs v. SolarCity 12/09/16] Patrick Peluso: Review notice that transcript has been filed	340.00	0.2	68.00
Hearings and other Court Appearances	[Gibbs v. SolarCity 12/12/16] Patrick Peluso: Review hearing transcript from 12/8 hearing	340.00	1.7	578.00
Communication	[Gibbs v. SolarCity 12/12/16] Steven Woodrow: Review email from J.Arisohn	440.00	0.1	44.00
Communication	[Gibbs v. SolarCity 12/13/16] Steven Woodrow: Conf w/ J.Arisohn re: SolarCity litigation and mediation	440.00	0.5	220.00
Communication	[Gibbs v. SolarCity 12/15/16] Steven Woodrow: Review email from Mediator	440.00	0.4	176.00
Communication	[Gibbs v. SolarCity 12/15/16] Steven Woodrow: Conf w/ P.Peluso re: settlement strategy	440.00	0.6	264.00
Settlement	[Gibbs v. SolarCity 12/16/16] Patrick Peluso: Review 12/15 email from Denlow's assistant outlining agenda for 12/21 call	340.00	0.3	102.00
Settlement	[Gibbs v. SolarCity 12/16/16] Patrick Peluso: Review and analyze Denlow's term sheet form, mediation procedures, and class action checklist	340.00	0.7	238.00
Pleadings, Motions, or other Writing	[Gibbs v. SolarCity 12/16/16] Patrick Peluso: Review and analyze motion for class certification filed by SolarCity	340.00	3.6	1,224.00
Settlement	[Gibbs v. SolarCity 12/16/16] Patrick Peluso: Review email from Denlow's administrator with updated dial-in info for initial call	340.00	0.2	68.00
Communication	[Gibbs v. SolarCity 12/16/16] Steven Woodrow: Conf w/ J.Arisohn and counsel for SolarCity re: Motion for Class Certification filed under seal in CA and ability to obtain copy (email exchange (.7)); conf w/ C.Sarchio (.2)	440.00	0.9	396.00

Task	Time Entry Notes	Rate	Hours	Line Total
General	[Gibbs v. SolarCity 12/16/16] Steven Woodrow: Review and analyze Lucero motion for class certification	440.00	1.1	484.00
Communication	[Gibbs v. SolarCity 12/19/16] Steven Woodrow: Conf w/ J.Arisohn re: mediation in SolarCity and agreement to split case at 25% to WPLLC	440.00	0.2	88.00
Communication	[Gibbs v. SolarCity 12/20/16] Patrick Peluso: Conference w S Woodrow and S Coleman re upcoming call with Judge Denlow	340.00	0.4	136.00
Pleadings, Motions, or other Writing	[Gibbs v. SolarCity 12/20/16] Patrick Peluso: Review notice of supplemental authority filed by SolarCity on 12/19	340.00	0.2	68.00
Research	[Gibbs v. SolarCity 12/20/16] Patrick Peluso: Review and analyze Meyers v. Nicolet, 7th Circuit case filed by SCity as supp. authority	340.00	1.6	544.00
Communication	[Gibbs v. SolarCity 12/20/16] Patrick Peluso: Conference with S Woodrow re JPA	340.00	0.3	102.00
Pleadings, Motions, or other Writing	[Gibbs v. SolarCity 12/20/16] Steven Woodrow: Review SolarCity filing of Notice of Supplemental Authority: review supplemental authority and other decisions and strategy conf. re: whether to seek leave to file a response	440.00	1.3	572.00
Communication	[Gibbs v. SolarCity 12/20/16] Steven Woodrow: strategy session w/ S.Coleman and P.Peluso re: call w/ mediator	440.00	0.4	176.00
Communication	[Gibbs v. SolarCity 12/21/16] Patrick Peluso: Telephonic conference with mediator and all counsel re mediation	340.00	0.5	170.00
Pleadings, Motions, or other Writing	[Gibbs v. SolarCity 12/21/16] Patrick Peluso: Reviewing and analyzing draft joint prosecution agreement	340.00	0.9	306.00
Research	[Gibbs v. SolarCity 12/21/16] Patrick Peluso: Researching sample JPAs for what is customary	340.00	2.2	748.00
Communication	[Gibbs v. SolarCity 12/21/16] Steven Woodrow: Telephone conf. w/ Magistrate Judge Denlow and counsel participating in the mediation	440.00	0.5	220.00
Settlement	[Gibbs v. SolarCity 12/21/16] Steven Woodrow: Review and analyze JPA forwarded by J.Arisohn	440.00	0.7	308.00
Settlement	[Gibbs v. SolarCity 12/21/16] Steven Woodrow: Review mediation schedule and class action checklist	440.00	0.6	264.00
Research	[Gibbs v. SolarCity 12/23/16] Steven Woodrow: Further review of SolarCity's Notice of Supplemental authority and determination whether to file additional caselaw	440.00	0.4	176.00
Pleadings, Motions, or other Writing	[Gibbs v. SolarCity 12/29/16] Steven Woodrow: Outline draft mediation statement for Denlow mediation	440.00	0.8	352.00
Pleadings, Motions, or other Writing	[Gibbs v. SolarCity 12/30/16] Patrick Peluso: Review and analyze joint prosecution agreement edits	340.00	0.9	306.00

Task	Time Entry Notes	Rate	Hours	Line Total
General	[Gibbs v. SolarCity 12/30/16] Steven Woodrow: Review Joint Prosecution Agreement w/ Arisohn and Bursor and Nathan	440.00	0.4	176.00
Communication	[Gibbs v. SolarCity 01/05/17] Steven Woodrow: Finalize and revise proposed JPA and send to Arisohn for review	440.00	0.2	88.00
Communication	[Gibbs v. SolarCity 01/05/17] Steven Woodrow: Conf w/ Arisohn re: JPA	440.00	0.3	132.00
Communication	[Gibbs v. SolarCity 01/06/17] Patrick Peluso: Conference w S Woodrow S Coleman re joint prosecution agreement with Bursor and R Nathan	340.00	0.3	102.00
Communication	[Gibbs v. SolarCity 01/06/17] Steven Woodrow: Conf w/ S.Coleman re: JPA	440.00	0.3	132.00
Settlement	[Gibbs v. SolarCity 01/09/17] Patrick Peluso: Review Bursor's draft mediation statement and checklist	340.00	2.3	782.00
Settlement	[Gibbs v. SolarCity 01/09/17] Steven Woodrow: Review and analyze proposed mediation statement drafted by Bursor's office	440.00	0.8	352.00
Communication	[Gibbs v. SolarCity 01/09/17] Steven Woodrow: Email exchange w/ J.Arisohn re: mediation brief	440.00	0.3	132.00
Communication	[Gibbs v. SolarCity 01/09/17] Steven Woodrow: Execute and forward JPA to Arisohn	440.00	0.2	88.00
Communication	[Gibbs v. SolarCity 01/10/17] Patrick Peluso: Review email from JAMS re upcoming mediation	340.00	0.2	68.00
Settlement	[Gibbs v. SolarCity 01/10/17] Patrick Peluso: Conference with S Woodrow/J Arisohn regarding the draft mediation statement	340.00	0.7	238.00
Settlement	[Gibbs v. SolarCity 01/10/17] Patrick Peluso: Review S Woodrow's edits of mediation statement	340.00	1.3	442.00
Settlement	[Gibbs v. SolarCity 01/10/17] Patrick Peluso: Review email from J Arisohn to JAMS attaching mediation statement	340.00	0.2	68.00
Communication	[Gibbs v. SolarCity 01/10/17] Steven Woodrow: Conf and email exchange w/ J.Arisohn and R.Nathan re: draft mediation statement and conf re: proposed edits	440.00	2.4	1,056.00
Settlement	[Gibbs v. SolarCity 01/10/17] Steven Woodrow: Draft and revise required "Mediator's Checklist" per Magistrate Judge Denlow's mediation procedures	440.00	2.1	924.00
Settlement	[Gibbs v. SolarCity 01/17/17] Patrick Peluso: Signing and sending JAMS engagement letter	340.00	0.2	68.00
Settlement	[Gibbs v. SolarCity 01/24/17] Patrick Peluso: Review and analyze SolarCity mediation statement and the depo transcripts attached	340.00	4.6	1,564.00
Communication	[Gibbs v. SolarCity 01/24/17] Patrick Peluso: Conference with S Woodrow regarding SC's mediation statement	340.00	0.3	102.00

Task	Time Entry Notes	Rate	Hours	Line Total
Settlement	[Gibbs v. SolarCity 01/24/17] Steven Woodrow: Review and analyze SolarCity's mediation statement: review argument (1.6); review cases cited in support of arguments (2.1)	440.00	3.7	1,628.00
Communication	[Gibbs v. SolarCity 01/26/17] Patrick Peluso: Conference with S Woodrow S Coleman re strategy at mediation	340.00	0.4	136.00
Communication	[Gibbs v. SolarCity 01/26/17] Steven Woodrow: Conf w/ S.Coleman re: mediation strategy	440.00	1.4	616.00
Settlement	[Gibbs v. SolarCity 01/27/17] Patrick Peluso: Review and analyze all pertinent filings in both SolarCity cases, and the mediation statements, in advance of mediation	340.00	5.8	1,972.00
Settlement	[Gibbs v. SolarCity 01/29/17] Patrick Peluso: Review email from R Luskey providing definitive opening settlement offer.	340.00	0.3	102.00
Settlement	[Gibbs v. SolarCity 01/29/17] Steven Woodrow: Review "settlement offer" from SolarCity	440.00	0.1	44.00
Settlement	[Gibbs v. SolarCity 01/30/17] Patrick Peluso: Travel to Chicago for SolarCity mediation	340.00	5.5	1,870.00
Settlement	[Gibbs v. SolarCity 01/30/17] Patrick Peluso: Additional review of pertinent case documents to prep for mediation	340.00	3.4	1,156.00
Communication	[Gibbs v. SolarCity 01/30/17] Patrick Peluso: Conference w S Woodrow re mediation strategy	340.00	0.5	170.00
General	[Gibbs v. SolarCity 01/30/17] Steven Woodrow: Travel from DEN to CHI for mediation with Magistrate Judge Denlow	440.00	5.5	2,420.00
Settlement	[Gibbs v. SolarCity 01/30/17] Steven Woodrow: Review all pleadings, key filings, and mediation statements in preparation for mediation with magistrate judge Denlow of JAMS in Chicago	440.00	2.3	1,012.00
Communication	[Gibbs v. SolarCity 01/30/17] Steven Woodrow: Conf w/ P.Peluso re: settlement strategy	440.00	0.7	308.00
Settlement	[Gibbs v. SolarCity 01/31/17] Patrick Peluso: SolarCity mediation at JAMS Chicago with Judge Denlow	340.00	8.5	2,890.00
Settlement	[Gibbs v. SolarCity 01/31/17] Patrick Peluso: Travel back home from mediation in Chicago SolarCity	340.00	5.5	1,870.00
Communication	[Gibbs v. SolarCity 01/31/17] Patrick Peluso: Conference with S Coleman re mediation	340.00	0.4	136.00
Settlement	[Gibbs v. SolarCity 01/31/17] Steven Woodrow: Mediation with Magistrate Judge Denlow in Chicago	440.00	8.5	3,740.00
Settlement	[Gibbs v. SolarCity 01/31/17] Steven Woodrow: Travel back from Chicago to Denver following mediation	440.00	5.5	2,420.00
Settlement	[Gibbs v. SolarCity 01/31/17] Steven Woodrow: Conf w/ P.Peluso re: proposed class definition	440.00	0.6	264.00
Communication	[Gibbs v. SolarCity 01/31/17] Steven Woodrow: Conf w/ R.Nathan re: mediation and prospects for settlement	440.00	0.4	176.00

Task	Time Entry Notes	Rate	Hours	Line Total
Communication	[Gibbs v. SolarCity 02/01/17] Patrick Peluso: Conference with co-counsel re withdrawal of motion to intervene in light of JPA and mediation	340.00	0.6	204.00
Settlement	[Gibbs v. SolarCity 02/01/17] Patrick Peluso: Review follow up email from judge denlow	340.00	0.2	68.00
Research	[Gibbs v. SolarCity 02/01/17] Patrick Peluso: Review and analyze motion to strike filed in Morris	340.00	2.7	918.00
Settlement	[Gibbs v. SolarCity 02/01/17] Patrick Peluso: Researching the AT&T case discussed at mediation	340.00	2.7	918.00
Settlement	[Gibbs v. SolarCity 02/01/17] Patrick Peluso: Researching Orrick's Dish TCPA case and trial, discussed at mediation	340.00	2.1	714.00
Settlement	[Gibbs v. SolarCity 02/01/17] Steven Woodrow: Strategy session re: withdrawal of Motion to Intervene	440.00	0.6	264.00
Settlement	[Gibbs v. SolarCity 02/01/17] Steven Woodrow: Conf w/ Mediator re: mediation and follow up down the road	440.00	0.4	176.00
Pleadings, Motions, or other Writing	[Gibbs v. SolarCity 02/02/17] Patrick Peluso: Review and analyze withdrawal of motion to intervene/transfer filed by Bursor	340.00	0.5	170.00
General	[Gibbs v. SolarCity 02/02/17] Steven Woodrow: Review notice of withdrawal of motion to intervene	440.00	0.2	88.00
Communication	[Gibbs v. SolarCity 02/02/17] Steven Woodrow: Conf w/ R.Nathan re: next steps re: settlement	440.00	0.3	132.00
Research	[Gibbs v. SolarCity 02/13/17] Patrick Peluso: Legal research re SolarCity's arbitration clause and applicability to our clients	340.00	2.8	952.00
Communication	[Gibbs v. SolarCity 02/13/17] Patrick Peluso: Conference w S Woodrow re arb clause research	340.00	0.8	272.00
Communication	[Gibbs v. SolarCity 02/13/17] Patrick Peluso: Review and analyze letter from SC requesting to inspect our client's internet accessible devices.	340.00	0.4	136.00
Research	[Gibbs v. SolarCity 02/13/17] Patrick Peluso: Legal research into whether arbitration defense is waived when a defendant waits so long to assert it	340.00	1.5	510.00
Research	[Gibbs v. SolarCity 02/13/17] Patrick Peluso: Researching how courts in the 1st Circuit have construed browsewrap arb agreements	340.00	3.1	1,054.00
Communication	[Gibbs v. SolarCity 02/13/17] Steven Woodrow: Review and analyze demand by SolarCity to inspect Colby and Gibbs's phones and computers re: whether they consented to website arbitration terms	440.00	1.1	484.00
Communication	[Gibbs v. SolarCity 02/13/17] Steven Woodrow: Conf w/ S.Coleman re: request by SolarCity for clients' computers and comms. w/ clients	440.00	0.3	132.00

Task	Time Entry Notes	Rate	Hours	Line Total
Research	[Gibbs v. SolarCity 02/13/17] Steven Woodrow: Conf w/ P.Peluso re: SolarCity arbitration clause and analysis of likely application to Gibbs or Colby's claims	440.00	0.8	352.00
Research	[Gibbs v. SolarCity 02/14/17] Patrick Peluso: Researching SC's right to inspect all of our clients' internet accessible devices	340.00	1.1	374.00
Research	[Gibbs v. SolarCity 02/14/17] Steven Woodrow: Legal research re: ability to move to compel arbitration after losing motion to dismiss: waiver of right to enforce arbitration (3.3); review 1st Cir. arb cases (1.4)	440.00	4.7	2,068.00
Communication	[Gibbs v. SolarCity 02/16/17] Patrick Peluso: Conf w/ S Woodrow re settlement negotiations	340.00	0.4	136.00
Communication	[Gibbs v. SolarCity 02/16/17] Steven Woodrow: Conf w/ P.Peluso re: settlement negotiations	440.00	0.4	176.00
Research	[Gibbs v. SolarCity 02/22/17] Patrick Peluso: Review and analyze oppo to motion to strike filed by ND Cal plaintiffs	340.00	1.7	578.00
Communication	[Gibbs v. SolarCity 02/27/17] Patrick Peluso: Conference with R Nathan re covering a deposition in Texas	340.00	0.4	136.00
Research	[Gibbs v. SolarCity 02/27/17] Patrick Peluso: Researching instances where former class rep is deposed for class cert issues.	340.00	0.7	238.00
Research	[Gibbs v. SolarCity 02/28/17] Patrick Peluso: Researching current state of the law on SPokeo interpretation and consider whether to file notice of sup authority	340.00	4.1	1,394.00
Discovery	[Gibbs v. SolarCity 03/02/17] Steven Woodrow: Draft and revise proposed Rule 30(b)(6) deposition notice: initial draft of notice (1.1); editing of notice for topics relating to Gibbs and Colby (.7); edit re: facts relating to class allegations (.6)	440.00	2.4	1,056.00
Pleadings, Motions, or other Writing	[Gibbs v. SolarCity 03/08/17] Patrick Peluso: Review and analyze Court's order denying MTD	340.00	2.8	952.00
Communication	[Gibbs v. SolarCity 03/08/17] Patrick Peluso: Conference with Woodrow re impact of MTD denial on case and how to best position ourselves going forward	340.00	0.6	204.00
Research	[Gibbs v. SolarCity 03/08/17] Patrick Peluso: Reviewing and analyzing Van Patten, a Spokeo interpreting case from the 9th circuit relied heavily on by Mass. Judge in Order denying MTD	340.00	1.7	578.00
Pleadings, Motions, or other Writing	[Gibbs v. SolarCity 03/08/17] Steven Woodrow: Review and analyze Court order denying Motion to Dismiss: review Order denying MTD (2.4); analyze impact on pending settlement discussions and strategy session w/ P.Peluso (1.8)	440.00	4.2	1,848.00
Communication	[Gibbs v. SolarCity 03/09/17] Patrick Peluso: Conference S Woodrow re litigation strategy and settlement strategy	340.00	0.8	272.00



Task	Time Entry Notes	Rate	Hours	Line Total
Discovery	[Gibbs v. SolarCity 03/09/17] Patrick Peluso: Review, edit, and revise Woodrow draft RTPs	340.00	3.7	1,258.00
Communication	[Gibbs v. SolarCity 03/09/17] Steven Woodrow: Conf w/ P.Peluso re: litigation strategy in SolarCity case	440.00	0.8	352.00
Discovery	[Gibbs v. SolarCity 03/09/17] Steven Woodrow: Draft proposed set of RTPs to SolarCity in event that settlement remains forestalled	440.00	4.4	1,936.00
Discovery	[Gibbs v. SolarCity 03/10/17] Patrick Peluso: Review, edit, and revise Woodrow draft ROGs	340.00	4.2	1,428.00
Discovery	[Gibbs v. SolarCity 03/10/17] Steven Woodrow: Draft proposed set of interrogatories	440.00	3.3	1,452.00
Discovery	[Gibbs v. SolarCity 03/13/17] Patrick Peluso: Review Woodrow's discovery edits	340.00	0.6	204.00
Pleadings, Motions, or other Writing	[Gibbs v. SolarCity 03/13/17] Patrick Peluso: Review and analyze motion for class cert filed in Morris	340.00	2.8	952.00
Discovery	[Gibbs v. SolarCity 03/13/17] Steven Woodrow: Edit draft discovery	440.00	1.8	792.00
Pleadings, Motions, or other Writing	[Gibbs v. SolarCity 03/13/17] Steven Woodrow: Review and analyze Motion to Strike	440.00	0.9	396.00
Communication	[Gibbs v. SolarCity 03/14/17] Patrick Peluso: Conference w S Woodrow re discovery	340.00	0.6	204.00
Communication	[Gibbs v. SolarCity 03/14/17] Steven Woodrow: Conf w/ P.Peluso re: issuing discovery to SolarCity and impact on settlement or litigation	440.00	0.6	264.00
Pleadings, Motions, or other Writing	[Gibbs v. SolarCity 03/14/17] Steven Woodrow: Review Lucero's Opposition to Motion to Strike Portions of Reply brief in supp of class cert	440.00	1.1	484.00
Discovery	[Gibbs v. SolarCity 03/15/17] Patrick Peluso: Drafting RTAs in SC	340.00	3.7	1,258.00
Discovery	[Gibbs v. SolarCity 03/15/17] Steven Woodrow: Revise draft interrogatories to SolarCity	440.00	1.6	704.00
Research	[Gibbs v. SolarCity 03/15/17] Steven Woodrow: Review and analyze SolarCity's opposition to Motion for Class Cert (filed 3/9/17) (Lucero Dkt. 144) (2.2); review expert report (Dkt. 145) (.8)	440.00	3	1,320.00
Discovery	[Gibbs v. SolarCity 03/16/17] Patrick Peluso: Review Woodrow edits to Woodrow's latest ROG edits	340.00	0.4	136.00
Settlement	[Gibbs v. SolarCity 03/20/17] Patrick Peluso: Review follow up email from Judge Denlow	340.00	0.3	102.00
Settlement	[Gibbs v. SolarCity 03/20/17] Steven Woodrow: Review email from M.Denlow re: settlement discussions	440.00	0.2	88.00



Task	Time Entry Notes	Rate	Hours	Line Total
Research	[Gibbs v. SolarCity 03/21/17] Steven Woodrow: Review analysis of Tesla purchase of SolarCity	440.00	0.8	352.00
Pleadings, Motions, or other Writing	[Gibbs v. SolarCity 03/21/17] Steven Woodrow: Review and analyze Lucero Dkt. 159, Reply in Supp. of Motion to Strike Reply in Supp. of Class Cert	440.00	0.6	264.00
Pleadings, Motions, or other Writing	[Gibbs v. SolarCity 03/22/17] Patrick Peluso: Review and analyze SolarCity's Answer and affirmative defenses	340.00	3.4	1,156.00
Pleadings, Motions, or other Writing	[Gibbs v. SolarCity 03/22/17] Steven Woodrow: Review and analyze SolarCity's answer and affirmative defenses	440.00	1.2	528.00
Communication	[Gibbs v. SolarCity 03/23/17] Patrick Peluso: Conference w Woodrow re Tesla purchasing solarcity	340.00	0.4	136.00
Research	[Gibbs v. SolarCity 03/23/17] Patrick Peluso: Legal research into the viability of SolarCity's 14 affirmative defenses and how they've been applied n the TCPA context, with focus on due process, 8th amendment, established business relationship, and safe harbor	340.00	6.8	2,312.00
Communication	[Gibbs v. SolarCity 03/23/17] Steven Woodrow: Conf w/ P.Peluso re: Tesla purchase and impact on claims	440.00	0.4	176.00
Research	[Gibbs v. SolarCity 03/24/17] Steven Woodrow: Review and analyze Reply to Motion to Strike Declaration, Expert Report and Testimony of Ray Horak	440.00	0.7	308.00
Settlement	[Gibbs v. SolarCity 03/27/17] Steven Woodrow: Conf. w/ R.Nathan and J.Arisohn re: settlement	440.00	0.4	176.00
Settlement	[Gibbs v. SolarCity 04/06/17] Patrick Peluso: Review and analyze spreadsheet sent by J Arisohn comparing TCPA settlements defense counsel had previously done to our case	340.00	0.7	238.00
Communication	[Gibbs v. SolarCity 04/06/17] Steven Woodrow: Review and analyze J.Arisohn email re: settlement discussions: (.4); analyze settlements in attachment to email (.8)	440.00	1.2	528.00
Communication	[Gibbs v. SolarCity 04/07/17] Patrick Peluso: Discussion with S Woodrow re discovery -- decided to hold off	340.00	0.4	136.00
Communication	[Gibbs v. SolarCity 04/07/17] Steven Woodrow: Conf w/ P.Peluso re: holding off on discovery	440.00	0.4	176.00
Discovery	[Gibbs v. SolarCity 04/12/17] Steven Woodrow: Analysis of experts potentially needed in case (1.1) and list of potential experts (1.6)	440.00	2.7	1,188.00
Discovery	[Gibbs v. SolarCity 04/14/17] Steven Woodrow: Draft outline of potential third party subpoenas if case is litigated	440.00	1.1	484.00
Communication	[Gibbs v. SolarCity 04/19/17] Patrick Peluso: Strategy session w S Woodrow re settlement and the litigation more broadly	340.00	0.8	272.00
Research	[Gibbs v. SolarCity 04/19/17] Patrick Peluso: Research into whether we should add Doe defendant call centers	340.00	1.6	544.00

Task	Time Entry Notes	Rate	Hours	Line Total
Communication	[Gibbs v. SolarCity 04/19/17] Steven Woodrow: Conf w/ P.Peluso re: settlement and litigation strategy	440.00	0.8	352.00
Communication	[Gibbs v. SolarCity 04/27/17] Patrick Peluso: Conference with S Woodrow re SolarCity updated offer	340.00	0.4	136.00
Communication	[Gibbs v. SolarCity 04/27/17] Steven Woodrow: Conf w/ J.Arisohn re: settlement discussions	440.00	0.4	176.00
Communication	[Gibbs v. SolarCity 05/10/17] Steven Woodrow: Conf w/ J.Arisohn re: settlement	440.00	0.4	176.00
Communication	[Gibbs v. SolarCity 05/11/17] Patrick Peluso: Conf w/ Woodrow re latest settlement posture	340.00	0.3	102.00
Communication	[Gibbs v. SolarCity 05/11/17] Steven Woodrow: Conf w/ P.Peluso re: settlement and latest demand/offer	440.00	0.3	132.00
Hearings and other Court Appearances	[Gibbs v. SolarCity 05/12/17] Patrick Peluso: Review notice of scheduling conference	340.00	0.3	102.00
Research	[Gibbs v. SolarCity 05/12/17] Patrick Peluso: Reviewing judge's requirements pre-scheduling conference	340.00	0.8	272.00
Discovery	[Gibbs v. SolarCity 05/12/17] Steven Woodrow: Review draft discovery	440.00	1.7	748.00
General	[Gibbs v. SolarCity 05/17/17] Steven Woodrow: Legal research re: TCPA settlements where "millions" off class members and calls are at issue	440.00	1.3	572.00
Pleadings, Motions, or other Writing	[Gibbs v. SolarCity 05/19/17] Patrick Peluso: Drafting notice of settlement, advising of lucero deal	340.00	0.3	102.00
Settlement	[Gibbs v. SolarCity 05/19/17] Patrick Peluso: Call with J Arisohn on SolarCity update -- case is settled	340.00	0.2	68.00
Communication	[Gibbs v. SolarCity 05/19/17] Patrick Peluso: Conference with Woodrow re terms of SolarCity settlement and how we should notify the Gibbs court	340.00	0.9	306.00
Communication	[Gibbs v. SolarCity 05/19/17] Steven Woodrow: Conf w/ J.Arisohn re; settlement negotiations	440.00	0.3	132.00
Communication	[Gibbs v. SolarCity 05/19/17] Steven Woodrow: Conf w/ P.Peluso re: settlement in SolarCity: analysis of terms (.6); conf re notification of Gibbs court (.3)	440.00	0.9	396.00
Communication	[Gibbs v. SolarCity 05/22/17] Patrick Peluso: Conferral with opposing counsel re requesting a stay in Mass. case now that Lucero settled	340.00	0.4	136.00
Settlement	[Gibbs v. SolarCity 05/22/17] Patrick Peluso: Review notice sent by J Arisohn on 5/19 advising of settlement	340.00	0.3	102.00
Settlement	[Gibbs v. SolarCity 05/22/17] Patrick Peluso: Drafting email notice to Mass. judge (.5) and conferring with defense counsel (.3)	340.00	0.8	272.00

Task	Time Entry Notes	Rate	Hours	Line Total
Settlement	[Gibbs v. SolarCity 05/22/17] Patrick Peluso: Conferral with M Castles with the court re notice of settlement	340.00	0.3	102.00
Pleadings, Motions, or other Writing	[Gibbs v. SolarCity 05/24/17] Patrick Peluso: Drafting joint motion to adjourn status conference	340.00	0.5	170.00
Communication	[Gibbs v. SolarCity 05/24/17] Patrick Peluso: Conferral with E Echtman re joint motion	340.00	0.4	136.00
Pleadings, Motions, or other Writing	[Gibbs v. SolarCity 05/24/17] Patrick Peluso: Review and analyze Echtman's edits to joint motion	340.00	0.3	102.00
Pleadings, Motions, or other Writing	[Gibbs v. SolarCity 05/24/17] Steven Woodrow: Review Motion to Adjourn scheduling conference	440.00	0.3	132.00
Hearings and other Court Appearances	[Gibbs v. SolarCity 05/26/17] Patrick Peluso: Reviewing order granting motion to continue conference	340.00	0.2	68.00
Settlement	[Gibbs v. SolarCity 06/01/17] Patrick Peluso: Review follow-up email from Judge Denlow	340.00	0.3	102.00
Settlement	[Gibbs v. SolarCity 06/01/17] Patrick Peluso: Review and analyze draft settlement agreement and notice forms	340.00	3.7	1,258.00
Settlement	[Gibbs v. SolarCity 06/01/17] Steven Woodrow: Review and analyze proposed settlement documents from T.Cheung: review draft agreement (3.1); review notices (1.1)	440.00	4.2	1,848.00
Settlement	[Gibbs v. SolarCity 06/02/17] Patrick Peluso: Review S Woodrow's edits to draft settlement agreement (.4) and further revise (1.7)	340.00	1.9	646.00
Settlement	[Gibbs v. SolarCity 06/02/17] Steven Woodrow: Edit and revise draft settlement agreement	440.00	3.4	1,496.00
Settlement	[Gibbs v. SolarCity 06/04/17] Steven Woodrow: Revise and edit draft settlement notices	440.00	2.7	1,188.00
Communication	[Gibbs v. SolarCity 06/07/17] Steven Woodrow: Email w/ J.Airsohn and R.Nathan re: settlement docs	440.00	0.2	88.00
Communication	[Gibbs v. SolarCity 06/08/17] Patrick Peluso: Conference with S Woodrow and S Coleman re leadership in case	340.00	0.6	204.00
Settlement	[Gibbs v. SolarCity 06/08/17] Steven Woodrow: Review and analyze draft settlement docs from Bursor to Chueng	440.00	0.7	308.00
Communication	[Gibbs v. SolarCity 06/08/17] Steven Woodrow: Conf w J.Arisohn re; lead counsel	440.00	0.7	308.00
Communication	[Gibbs v. SolarCity 06/08/17] Steven Woodrow: Conf w/ P.Peluso and S.Coleman re: leadership	440.00	0.6	264.00
Communication	[Gibbs v. SolarCity 06/09/17] Patrick Peluso: Conference w S Woodrow re edits to settlement agr.	340.00	0.6	204.00
Research	[Gibbs v. SolarCity 06/09/17] Steven Woodrow: Review JPA	440.00	0.3	132.00
Communication	[Gibbs v. SolarCity 06/09/17] Steven Woodrow: Conf w/ R.Nathan re: JPA	440.00	0.6	264.00

Task	Time Entry Notes	Rate	Hours	Line Total
Communication	[Gibbs v. SolarCity 06/09/17] Steven Woodrow: Conf w/ P.Peluso re: edits to settlement agreement	440.00	0.6	264.00
General	[Gibbs v. SolarCity 06/15/17] Steven Woodrow: Review claims held by Plaintiff Lucero and analyze capacity to represent all settlement claims	440.00	0.6	264.00
Communication	[Gibbs v. SolarCity 06/22/17] Patrick Peluso: Conference with S Woodrow re updated I received from Arisohn on settlement agreement negotiations	340.00	0.4	136.00
Communication	[Gibbs v. SolarCity 06/23/17] Patrick Peluso: Conference with S Woodrow re motion to enforce	340.00	0.3	102.00
Communication	[Gibbs v. SolarCity 06/23/17] Patrick Peluso: Conference with S Woodrow re Cruise case	340.00	0.3	102.00
Research	[Gibbs v. SolarCity 06/23/17] Steven Woodrow: Review and analyze settlement in Birchmeier (TCPA cruise settlement \$50MM - \$75MM)	440.00	1.7	748.00
Communication	[Gibbs v. SolarCity 06/23/17] Steven Woodrow: Conf w/ P.Peluso re: Motion to Enforce Settlement	440.00	0.3	132.00
General	[Gibbs v. SolarCity 06/23/17] Steven Woodrow: Review and analyze Motion to Enforce Settlement (Lucero Dkt. 168)	440.00	0.9	396.00
Research	[Gibbs v. SolarCity 06/26/17] Patrick Peluso: Review ND Cal plaintiffs' motion to enforce term sheet	340.00	1.1	374.00
Research	[Gibbs v. SolarCity 06/26/17] Patrick Peluso: Legal research re 9th Circuit law on enforcing term sheets	340.00	1.7	578.00
Communication	[Gibbs v. SolarCity 06/27/17] Patrick Peluso: Conf with S Woodrow re class counsel structure	340.00	0.4	136.00
Communication	[Gibbs v. SolarCity 06/27/17] Steven Woodrow: Conf w/ P.Peluso re: leadership structure in settlement	440.00	0.4	176.00
Research	[Gibbs v. SolarCity 06/28/17] Steven Woodrow: Research re: duty of non-party to support settlement agreement	440.00	1.7	748.00
Research	[Gibbs v. SolarCity 06/29/17] Patrick Peluso: Legal research into possible remedies for Gibbs/Colby being cut out of ND Cal settlement as class reps and us as settlement class counsel	340.00	1.9	646.00
Settlement	[Gibbs v. SolarCity 07/10/17] Patrick Peluso: Review, analyze, and consider SolarCity's proposal that we agree to a no publicity clause	340.00	0.8	272.00
Research	[Gibbs v. SolarCity 07/10/17] Patrick Peluso: Legal research into how prevalent these no publicity clauses are and how broadly they've been interpreted	340.00	2.4	816.00
Communication	[Gibbs v. SolarCity 07/11/17] Steven Woodrow: Conf w/ J.Arisohn re: publicity	440.00	0.4	176.00

Task	Time Entry Notes	Rate	Hours	Line Total
Settlement	[Gibbs v. SolarCity 07/12/17] Patrick Peluso: Confer with local counsel re no publicity clause	340.00	0.4	136.00
Communication	[Gibbs v. SolarCity 07/12/17] Steven Woodrow: Conf w/ counsel re: confidentiality/publicity agreement	440.00	1.4	616.00
Communication	[Gibbs v. SolarCity 07/14/17] Steven Woodrow: Conf w/ R.Nathan re: settlement and leadership structure	440.00	0.2	88.00
Research	[Gibbs v. SolarCity 07/18/17] Steven Woodrow: Review and analyze JPA re: leadership	440.00	0.6	264.00
Pleadings, Motions, or other Writing	[Gibbs v. SolarCity 07/20/17] Steven Woodrow: Review and analyze Motion for Settlement filed in Lucero action	440.00	1.8	792.00
Research	[Gibbs v. SolarCity 07/21/17] Steven Woodrow: Legal research re: Judge Seeborg	440.00	0.7	308.00
Communication	[Gibbs v. SolarCity 07/27/17] Patrick Peluso: Confer with opposing counsel re joint motion to stay	340.00	0.4	136.00
Hearings and other Court Appearances	[Gibbs v. SolarCity 08/01/17] Patrick Peluso: Review notice re-scheduling scheduling conf	340.00	0.2	68.00
Communication	[Gibbs v. SolarCity 08/01/17] Patrick Peluso: Conference w S Woodrow re scheduling conf	340.00	0.5	170.00
Communication	[Gibbs v. SolarCity 08/01/17] Steven Woodrow: Conf w/ P.Peluso re: scheduling conference	440.00	0.5	220.00
Communication	[Gibbs v. SolarCity 08/03/17] Patrick Peluso: Conferral with co-counsel re joint motion to stay	340.00	0.4	136.00
Pleadings, Motions, or other Writing	[Gibbs v. SolarCity 08/03/17] Patrick Peluso: Review and analyze draft joint motion to stay	340.00	0.7	238.00
Pleadings, Motions, or other Writing	[Gibbs v. SolarCity 08/03/17] Patrick Peluso: Review draft joint motion to stay (actual motion, not memorandum IS)	340.00	0.3	102.00
Pleadings, Motions, or other Writing	[Gibbs v. SolarCity 08/03/17] Patrick Peluso: Review filings of joint motin to stay and memo IS	340.00	0.4	136.00
Hearings and other Court Appearances	[Gibbs v. SolarCity 08/03/17] Patrick Peluso: Review notice of new scheduling conf	340.00	0.2	68.00
Pleadings, Motions, or other Writing	[Gibbs v. SolarCity 08/03/17] Steven Woodrow: Review and analyze Motion to Stay	440.00	0.7	308.00
Research	[Gibbs v. SolarCity 09/06/17] Steven Woodrow: Review status of D.C.Cir appeal of FCC's 2015 TCPA Order and analyze application to settlement value	440.00	1.7	748.00
Settlement	[Gibbs v. SolarCity 09/08/17] Patrick Peluso: Review and analyze notice of addendum to settlement agreement filed in ND Cal case	340.00	1.3	442.00
Communication	[Gibbs v. SolarCity 09/11/17] Patrick Peluso: Conference with S Woodrow and S Coleman re preliminary approval process and updating clients	340.00	0.7	238.00


Task	Time Entry Notes	Rate	Hours	Line Total
Research	[Gibbs v. SolarCity 09/11/17] Steven Woodrow: Review addendum to settlement agreement and proposed order granting preliminary approval	440.00	1.2	528.00
Communication	[Gibbs v. SolarCity 09/11/17] Steven Woodrow: Conf w/ P.Peluso and S.Coleman re: preliminary approval and comm. w/ clients	440.00	0.7	308.00
Communication	[Gibbs v. SolarCity 09/18/17] Patrick Peluso: Conferral with E Echtman re Coleman's anticipate pro hac	340.00	0.4	136.00
Pleadings, Motions, or other Writing	[Gibbs v. SolarCity 09/18/17] Patrick Peluso: Review Coleman's draft pro hac	340.00	0.3	102.00
Research	[Gibbs v. SolarCity 09/18/17] Patrick Peluso: Review and analyze prelim approval order	340.00	2.3	782.00
Communication	[Gibbs v. SolarCity 09/20/17] Patrick Peluso: Conferral with J Arisohn re Coleman's pro hac	340.00	0.3	102.00
Hearings and other Court Appearances	[Gibbs v. SolarCity 09/25/17] Patrick Peluso: Review notice of filing of Coleman pro hac	340.00	0.2	68.00
Communication	[Gibbs v. SolarCity 09/25/17] Patrick Peluso: Conf w S Coleman re pro hac motion	340.00	0.3	102.00
Communication	[Gibbs v. SolarCity 09/25/17] Steven Woodrow: conf w/ S.Coleman re: pro hac vice application	440.00	0.3	132.00
Hearings and other Court Appearances	[Gibbs v. SolarCity 09/26/17] Patrick Peluso: Review order granting coleman pro hac	340.00	0.2	68.00
Settlement	[Gibbs v. SolarCity 10/10/17] Patrick Peluso: Review email from J Arisohn re upcoming fee brief	340.00	0.2	68.00
Communication	[Gibbs v. SolarCity 10/10/17] Patrick Peluso: Conference w Woodrow re our time in case ahead of Mot for Attorneys fees	340.00	0.4	136.00
General	[Gibbs v. SolarCity 10/10/17] Steven Woodrow: Review preliminary approval order	440.00	0.3	132.00
Communication	[Gibbs v. SolarCity 10/10/17] Steven Woodrow: Conf w/ P.Peluso re: billing and time in prep for Motion for Reasonable Attorneys Fees	440.00	0.4	176.00
Communication	[Gibbs v. SolarCity 10/18/17] Patrick Peluso: Confer with E Echtman re upcoming conference	340.00	0.3	102.00
Pleadings, Motions, or other Writing	[Gibbs v. SolarCity 10/18/17] Patrick Peluso: Draft joint motion to adjourn 10/27 conf	340.00	0.5	170.00
Pleadings, Motions, or other Writing	[Gibbs v. SolarCity 10/18/17] Steven Woodrow: Review Joint Motion to Continue Status conference	440.00	0.5	220.00
Communication	[Gibbs v. SolarCity 10/20/17] Steven Woodrow: Conf w/ P.Peluso re: billing and time and JPA	440.00	0.3	132.00
Hearings and other Court Appearances	[Gibbs v. SolarCity 10/23/17] Patrick Peluso: Review order granting motion to continue	340.00	0.2	68.00

Task	Time Entry Notes	Rate	Hours	Line Total
Pleadings, Motions, or other Writing	[Gibbs v. SolarCity 10/30/17] Patrick Peluso: Review and analyze proposed declaration in support of Iodestar	340.00	0.9	306.00
General	[Gibbs v. SolarCity 10/30/17] Steven Woodrow: Review and analyze time spent in case and firm Iodestar	440.00	0.8	352.00
Communication	[Gibbs v. SolarCity 10/30/17] Steven Woodrow: Review proposed declaration in support of firm's Iodestar	440.00	0.7	308.00

<b>Total</b>	<b>238,960.00</b>
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Amount Paid	0.00
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<b>Balance Due (USD)</b>	<b>\$238,960.00</b>
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This invoice was sent using 

## PAYMENT STUB

Woodrow & Peluso, LLC  
 3900 E Mexico Ave  
 Suite 300  
 Denver CO  
 United States

<b>Client</b>	ppeluso@woodrowpeluso.com
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<b>Invoice #</b>	0000100
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<b>Invoice Date</b>	October 31, 2017
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<b>Balance Due (USD)</b>	<b>\$238,960.00</b>
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<b>Amount Enclosed</b>	
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# EXHIBIT C



## Woodrow & Peluso LLC

### Expense Report SolarCity

<b>Date</b>	<b>Type of Expense</b>	<b>Amount</b>
6/24/2016	Service of Process	\$ 75.00
7/28/2016	Pro Hac Vice Fees	\$ 200.00
12/1/2016	Roundtrip flights to and from 12/8 hearing	\$ 311.50
12/7/2016	Hotel in Worcester night before 12/8 hearing	\$ 174.81
12/8/2016	Hotel in Boston night after 12/8 hearing	\$ 213.05
12/8/2016	Food purchases while in Worcester/Boston	\$ 53.68
12/9/2016	Parking charges at airport 12/8 hearing	\$ 48.00
1/23/2017	Roundtrip flights for Mediation in Chicago	\$ 221.83
1/23/2017	Hotel Rooms in Chicago for mediation	\$ 298.86
1/31/2017	Food purchases while in Chicago for mediation	\$ 107.92
	<b>Total</b>	<b>\$ 1,704.65</b>